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(1509)

ICF TECHNOLOGY INCORPORATED

MEMORANDUM

SUBMITTED TO: Rachel Loftin, U.S. Environmental Protection Agency

PREPARED BY: Janine M. Young, ICF Technology, Incorporated JY

THROUGH: Matthew Williams, Ecology and Environment, Incorporated

DATE: October 16, 1991

SUBJECT: Completed Work

COPY: Marcia Brooks, Ecology and Environment, Incorporated

This list is for the attached completed:

PA __ PA Review __ SSI __ LSI __

Other EPI PA

Site Name: Grow Group, Inc. Consumer Products Division

EPA ID#: CAD085393080 (189)

City, County: Commerce, Los Angeles

State Recommendation:
(for Reviews only)

11/13/14/91

FOR EPA USE ONLY

CERCLIS Lead: EPA | PA-1 Complete | D 11/14/91 | C399=E
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11.14.91

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ICF TECHNOLOGY INCORPORATED

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT

Purpose:	RCRA Preliminary Assessment
Site:	Grow Group, Inc. Consumer Products Division 2501 Malt Avenue Commerce, CA 90040 Los Angeles
Site EPA ID Number:	CAD085393080
TDD Number:	F9-9105-033
Program Account Number:	FCA1791RAA
FIT Investigators:	Janine Young and Yoon Toh, ICF Technology, Incorporated
Date of Inspection:	August 7, 1991
Report Prepared By:	Janine M. Young, ICF Technology, Incorporated
Report Date:	October 16, 1991
FIT Review/Concurrence:	10-17-91
Submitted To:	Rachel Loftin Site Assessment Manager, EPA Region IX

1. INTRODUCTION

As part of the its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested ICF Technology, Inc.'s Field Investigation Team (FIT), subcontractors to Ecology and Environment, Inc., to conduct a Preliminary Assessment (PA) of Grow Group, Inc. Consumer Products Division located at 2150 Malt Avenue, Commerce, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA), with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), in order to set priorities for cleanup of the most environmentally significant sites first. The PA is conducted using CERCLA Hazard Ranking System (HRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, assist in prioritizing facilities for the RCRA Program.

2. SITE DESCRIPTION

2.1 Site Location and Owner/Operator History

Grow Group, Inc. Consumer Products Division (Grow Group) is located on 2501 Malt Avenue, Commerce, California (T. 2S., R. 12W., sec. 21, San Bernadino baseline and meridian; lat. 33° 59' 00" N., long. 118° 07' 30" W.) (1). A site location map is presented as Figure 1. Grow Group is located in an industrial area and is bordered by Hyster Company to the east, CCA Company to the south and west, and a parking lot to the north (1,2). The facility has manufactured bleach, pool cleaning products, and plastic bleach containers since 1971 (2,3,6,10,32). The Grow Group site consists of the following:

- five buildings;
- below-grade sumps;
- an above-ground wastewater treatment system;
- a below-grade wastewater treatment system containing three sumps; and
- hazardous waste drum storage areas.

The facility also includes of an underground gasoline storage tank. A second underground storage tank, used to store diesel fuel, was removed in 1989. An evaluation of these tank areas will not be presented in this report because petroleum, including crude oil and refined fractions is specifically excluded from the definitions of "hazardous substance" and "pollutant or contaminant" in Sections 101 (14) and (33) of CERCLA. The site is entirely paved, and the facility is surrounded by a fence (2,4). A facility layout map is provided as Figure 2.

The Grow Group site is 7 acres in size and is located on three separate properties. The owners of the property are Goodyear Tire and Rubber Company, Georgia-Pacific Corporation (GP), and Golden Trust (2,5). The Golden Trust property was reportedly owned by Kilsby Tube Supply Company at one time (5,9). Reportedly, operations began at the site in March 1971 when GP began producing swimming pool care products, plastic bottles, and anti-freeze products (6,7,32). In 1986, GP vacated the facility and Grow Group began operations (2,6). The site is still actively occupied by Grow Group (2). There is no available information discussing land ownership or operators prior to 1980.

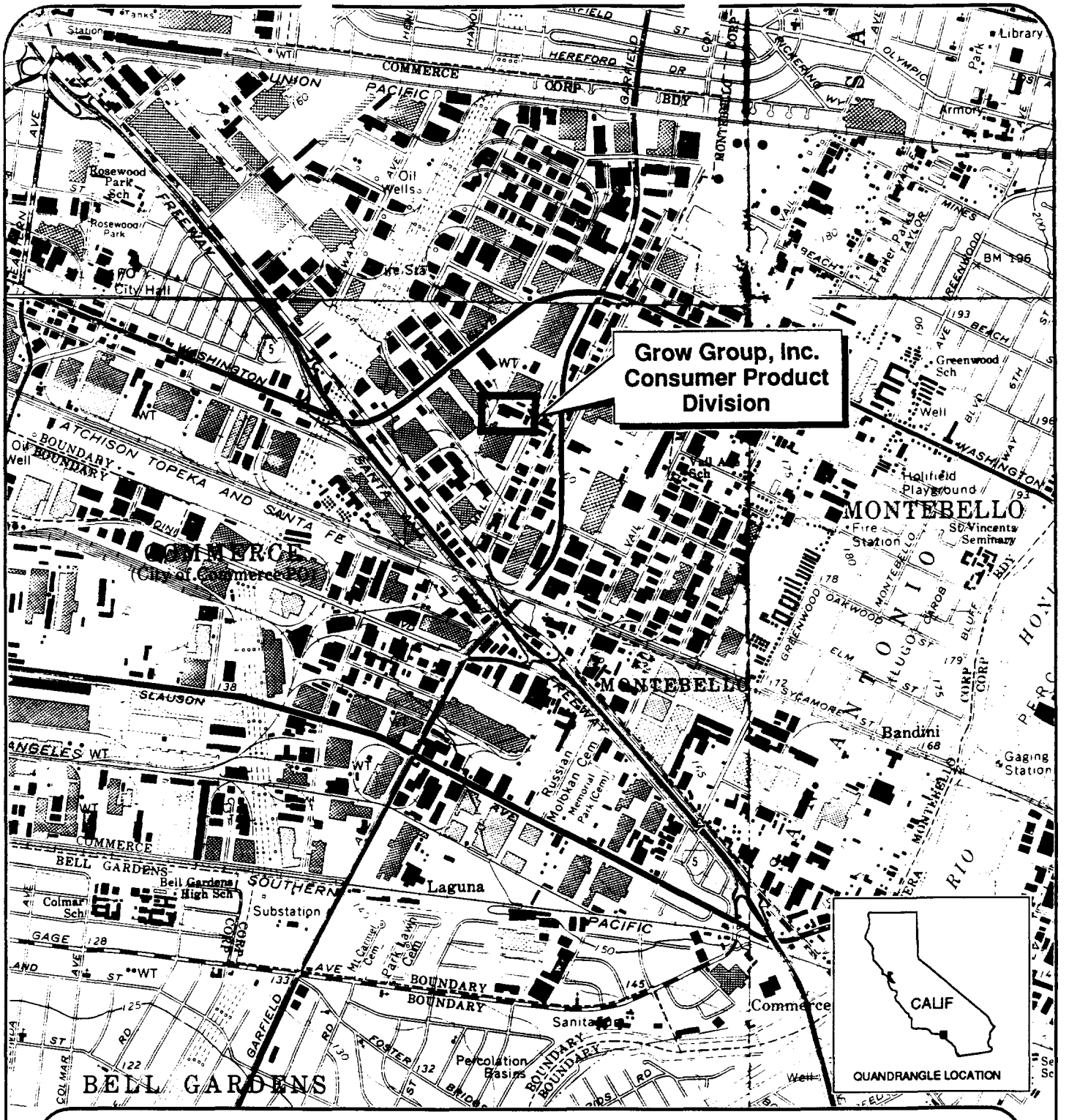

Figure 1 Site Location Map

Grow Group, Inc.
Consumer Product Division
2501 Malt Ave.
Commerce, CA

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SCALE 1:24,000

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Source: U.S. Department of the Interior, Geological Survey. Los Angeles, El Monte, South Gate, and Whitter Quadrangles California. 7.5-minute series (topographic). Photorevised 1981.

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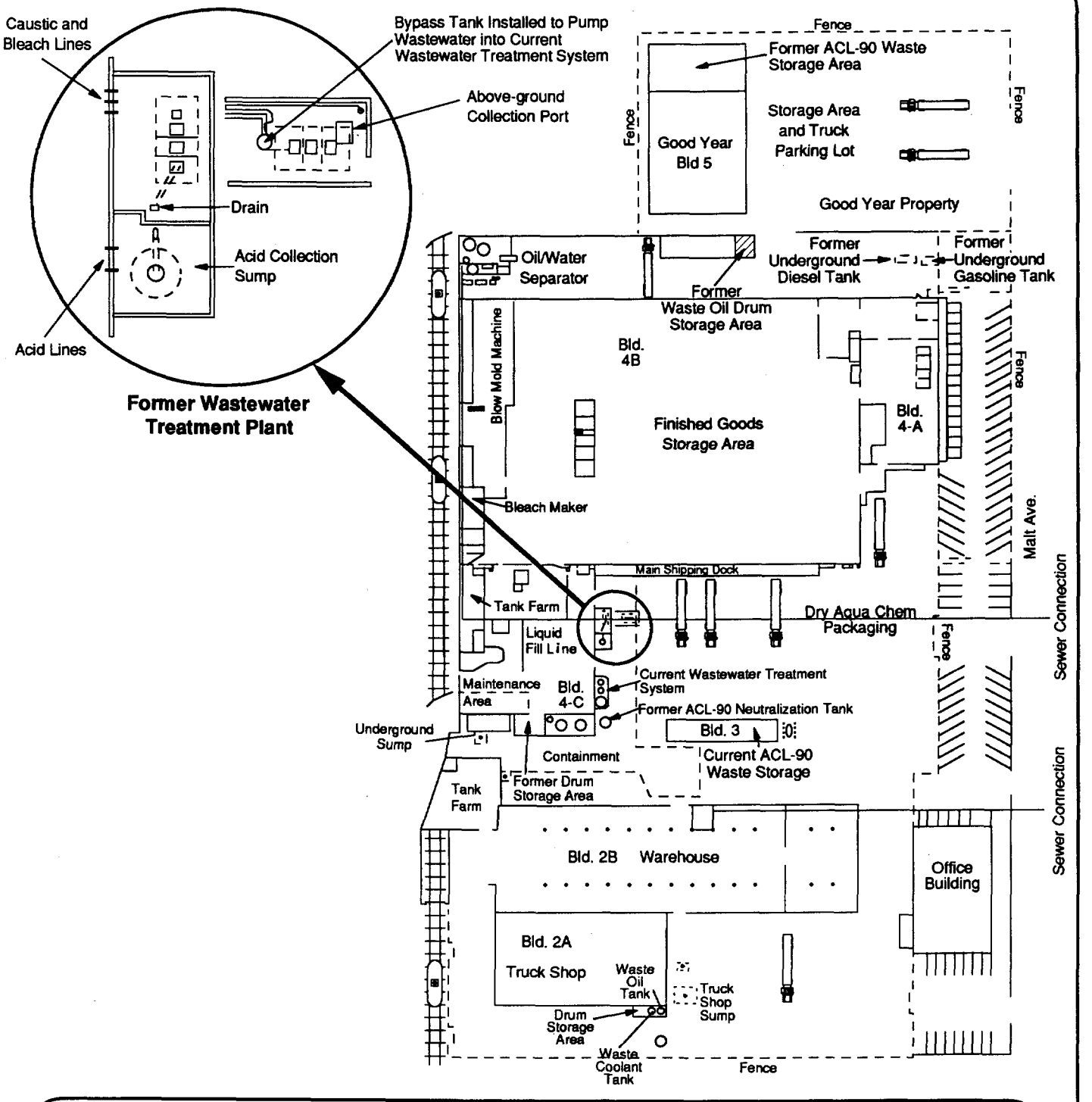

Figure 2 Facility Layout Map

Grow Group, Inc.
Consumer Product Division
2501 Malt Ave.
Commerce, CA

N

NOT TO SCALE

Source: Grow Group, Inc. Site Detail Map of Commerce, CA Facility. April 29, 1991.

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2.2 Facility Process/Waste Management

Georgia Pacific Corporation (GP)

GP manufactured bleach, dry and liquid pool chemicals (or chlorinators), and antifreeze. According to the California Department of Health Services (DHS), raw materials used to manufacture the dry chlorinators included calcium hypochlorite, sodium dichloro-S-triazinetrione (ACL-60), and trichloro-S-triazinetrione (ACL-90). Reportedly, liquid chlorine was produced by mixing chlorine gas with water (7). GP's Part A Hazardous Waste Facility permit application stated that acetone, 1,1,1-trichloroethane (TCA), and other chlorinated solvents were also used at the facility (6,32).

According to DHS, wastes generated by GP at the facility associated with the production of dry pool chemical products included floor sweepings of spilled chemicals, airborne dust captured by a baghouse system, and returned product. GP used several methods to remove the dry chemical waste from the site. The dry chemical waste was recycled by mixing the dry waste with water and sodium sulfite to create liquid pool chemical products; or the waste was disposed of in fiberboard drums; or the waste was neutralized in a 6,000-gallon tank and discharged to the city sewer system (see Section 4.2.1) (2,6,7,8,29). GP reportedly stored the drums of hazardous waste in a 20-foot by 40-foot storage area located near Building 4 (see Section 4.4) (6,32).

Wastes associated with the bleach manufacturing process included bleach, corrosive wastewater, and acidic wastewater (3). GP neutralized acidic or caustic wastewater in a four stage below-grade treatment system prior to discharge to the sewer (see Section 4.2.2) (2,3,6). Additional wastestreams produced by GP included waste oil which was stored in a 9-foot diameter tank located north of Building 4 (6,32).

Grow Group

Grow Group manufactures pool products, such as algaecide, anti-foam agents, clarifiers, pH adjusting agents, bleaches for household and commercial/industrial uses, and plastic containers (2,3). Raw materials, including hydrochloric and sulfuric acid, and sodium hydroxide, are transported to the site by railcar or truck and pumped into storage tanks. Dry materials, such as ACL-60, ACL-90, and calcium or lithium hypochlorite, are shipped to the facility in fiberboard drums, plastic drums, and nylon sacks. These raw materials are stored in various areas as shown in Figure 2 (3).

Three production processes have been used at the Grow Group site: bleach manufacturing, pool chemicals manufacturing, and bleach bottle manufacturing. The bleach process consists of pumping liquid chlorine from railroad cars, which are also used for storage, into pipelines containing caustics and large amounts of water. The caustics are stored in an indoor tank farm, and the product bleach is stored in six 7,600-gallon storage tanks which are also located in the indoor tank farm. This indoor tank farm is located in Building 4. Separate packaging or filling lines, also located in Building 4, are used to fill bottles with household bleach and muriatic (or hydrochloric) acid. Grow Group planned to discontinue manufacturing bleach in August 1991 (2).

Wastes generated from the bleach manufacturing area include spilled bleach and caustics, and waste oil from the machinery hydraulics. In the bleach manufacturing area, trenches are used to collect spills, and the spilled liquid is pumped into the above-ground wastewater treatment system prior to being discharged to the sewer under permit (see Section 4.2.3). The waste oil is currently pumped into an oil and water separator tank (see Section 4.3.1) (2).

Pool chemicals were manufactured by pressing dry ACL-90 (or ACL-60) into tablets. The finished product was packaged in 2-pound bags. According to Grow Group, this manufacturing process ceased on June 30, 1991, and the equipment, used to produce these pool tablets, was dismantled and sold (2). Floor sweepings and dusts, collected from the pool tablet manufacturing process area, were placed into drums and stored in Building 5 from 1986 until 1988 (see Section 4.1.1). This waste is currently stored in Building 3 (see Section 4.1.2). From 1986 until 1988, Grow Group neutralized ACL-90 wastes in a 6,000-gallon tank (see Section 4.2.1) (2).

Besides bleach and pool chemical manufacturing, Grow Group manufactured bleach containers with a polyethylene blow mold machine. The facility is no longer producing bleach containers, and the machinery has been dismantled and will be sold (2). Waste oil, generated from the blow mold machine's hydraulics, was collected in an oil and water separator (see Section 4.3.1).

From 1986 until 1989, Grow Group operated a fleet of trucks. Wastestreams generated by Grow Group in the operation of the fleet have included waste oil from a truck maintenance shop and waste oil collected from a 3,200-gallon sump used for maintance and steam-cleaning (see Section 4.3.3) (2).

Currently, Grow Group is in the process of terminating the GP and Goodyear Rubber and Tire Company leases. Grow Group plans to cease all bleach and pool chemical production at the site and plans to become a bleach and pool product distribution facility on the Golden Trust property. A closure plan is currently being developed for DHS (2,3).

3. REGULATORY INVOLVEMENT

3.1 U.S. Environmental Protection Agency (EPA)

On November 17, 1980, GP filed a RCRA Part A Hazardous Waste Facility permit application for a hazardous waste storage tank, a hazardous waste drum storage area, and a wastewater treatment system (6,32). In July 1985, GP requested that EPA change the facility status from TSDF interim status to generator only. GP maintained that on-site treatment was limited to elementary neutralization; hazardous waste were not stored on site for longer than 90 days; and GP considered themselves as a protective filer (6,11). EPA responded to GP in August 1985 and stated that DHS had the authorization to issue RCRA permits and that GP's request was forwarded to DHS (6,12). EPA then requested that DHS review GP's withdrawal application and inform EPA of DHS' decision (13). There is no

known available information indicating that DHS contacted EPA regarding changes to the facility status. In July 1986, Grow Group informed EPA of a change of ownership of operations at the site, and requested that all EPA identification numbers be transferred to Grow Group (9,10). Grow Group submitted to EPA a Notification of Hazardous Waste Acitivity in September 1986 (9). Grow Group is listed in the EPA RCRA database as a Part A Hazardous Waste Facility permit application withdrawal candidate. GP is not listed in the database (65).

EPA's Emergency Response Section responded to a chlorine gas release at the Grow Group site in September 1988 (see Sections 3.2, 4.1.2 and 5.5) (14).

3.2 California Department of Health Services (DHS)

DHS has been involved with the Grow Group site since 1981 when GP completed an Interim Status Document (ISD) questionnaire (15,16). DHS, however, never issued an ISD to the Grow Group site (15,16,17). In 1984, a DHS inspector recommended that the site be given a variance from the ISD because other regulatory agencies were involved with the facility, and simple neutralization was the only treatment used on site (15,17). However, DHS continued to investigate the site as an interim status TSDF and during a 1987 inspection Grow Group was cited for violations which included the failure to maintain records regarding hazardous waste storage; failure to maintain updated employee training records; and failure to properly close and label hazardous waste drums (6,17).

In February 1986, during GP's occupancy, two uncontrolled chemical reactions occured on site that released chlorine gas and resulted in DHS conducting an inspection in 1986 (see Appendix C) (6,17). The DHS inspector observed that more than 130 drums of dry pool chemical had accumulated on site and that waste oil was being collected in an on-site tank for off-site disposal (7,21). This tank, however, was not included in the facility's Part A Hazardous Waste Facility permit application (21,32).

DHS was informed by GP that the site was transferred to Grow Group in 1987 (18). After Grow Group acquired the facility, two evacuations of the nearby population were conducted by Los Angeles County Sherriff's Department in 1988 due to releases of chlorine gas from the facility (see Section 3.5). According to DHS, DHS and EPA were not informed by the facility of these releases within 24 hours (21). DHS conducted a compliance evaluation inspection in September 1988 and cited additional violations including failure to manage hazardous waste containers; the storage of ignitable wastes within 50 feet of the property line; failure to erect a dike, berm, or wall to separate incompatible wastes; and failure to minimize the possibility of a fire, explosion, or a release of hazardous waste to the environment (21). Grow Group then applied for a variance for on-site neutralization of ACL-60 and ACL-90 wastes (6,19). DHS denied Grow Group the variance because the wastes were toxic, ignitable, reactive, and considered to be RCRA hazardous wastes when discarded (6,20).

In February 1989, Grow Group informed DHS of their intentions to close the facility (6). DHS responded in March 1989 that the site is considered to be an interim status TSDF and

must comply with all interim status regulations (23). As part of Grow Group's closure, a closure plan is in the process of being submitted to DHS, and an Application for Hazardous Waste Facility Permit Variance was submitted for elementary neutralization of acids and bases, oil and water separators, and for storage of hazardous wastes in tanks for less than 90 days (2,24). The Grow Group site is not listed in the California Bond Expenditure Plan (66).

3.3 Regional Water Quality Control Board (RWQCB)

RWQCB has not been involved with the site (58).

3.4 South Coast Air Quality Management District (SCAQMD)

According to GP, SCAQMD issued air permits for acid tanks, baghouse processes, several holding tanks, and a liquid chemical mix tank (32). Reportedly, SCAQMD issued violations to Grow Group after a release of chlorine gas to the air occurred in August 1988 (25). SCAQMD conducted air sampling after a release of chlorine gas occurred in September 1988 (14). According to Grow Group, SCAQMD conducts annual inspections of the facility (2).

3.5 Other Agency Involvement

Agencies from Los Angeles County involved with the Grow Group site have included the County Fire Department, Department of Health Services, Sheriff's Department, and Sanitation District (25,26,27,28). These Los Angeles County agencies responded to several on-site incidents. Appendix C gives a brief description of these on-site incidents. The Los Angeles County Sanitation District filed a Report of Improper Disposal against Grow Group after a fire occurred in a County garbage truck in February 1988. The fire occurred because hydrochloric acid, which was produced by Grow Group, was reportedly dumped into the refuse (20,31). Los Angeles County Department of Health Services (LACDHS) issued violations to GP in February 1986 and to Grow Group in March 1988, August 1988, and September 1988 after releases of chlorine gas occurred at the site (29,30). The Los Angeles County Sheriff's Department evacuated 23,000 residents during the September 1988 release of chlorine gas to the air (14,29).

Grow Group has an industrial wastewater discharge permit issued by Los Angeles County Sanitation Districts (27). According to Grow Group, Los Angeles County Sanitation District samples the wastewater effluent at least once a year for oil, grease, suspended solids, and chemical oxygen demand (2,63).

4. DESCRIPTION OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, and soil. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents

might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment, FIT has identified nine significant SWMUs at the site. Figure 3 presents the general location of these SMWUs. It appears that Building 5 may be a RCRA-regulated unit because hazardous wastes were stored for more than 90 days. Additional SWMUs, however, may exist.

4.1 Dry Pool Chemical Waste Storage Areas

4.1.1 Former Dry Hazardous Waste Drum Storage Area/Building 5 (Figure 3, Area H)

Unit Description

Building 5 is approximately 100 feet by 200 feet by 20 feet high and has three sides with the fourth side covered with a heavy, green plastic tarp (2,5,33). At one time, approximately 552 drums of waste were stored in the northern quarter of Building 5 (14,33,34). The remaining area was used to store empty plastic containers used for packaging purposes (14). The waste was stored until Grow Group neutralized the material in a 6,000-gallon tank prior to sewer discharge (see Section 4.2.1) (31). Additionally, waste oil was reportedly stored along the south wall of Building 5 in 1988. The storage area for waste oil was moved to the hazardous waste oil tank and drum storage area near Building 2B in 1989 (see Section 4.3.2) (3,21,22).

Date of Startup

Grow Group began storing wastes in Building 5 in 1986 (2). There is no known available information indicating that GP used Building 5 to store wastes.

Date of Closure

Grow Group ceased using Building 5 to store wastes in September 1988. Building 5 is currently used to store empty packaging material (2).

Waste Managed

Drums of dry chemcial wastes, generated from airbone dust collected in baghouse filters, floor sweepings from the dry pool chemcial manufacturing area, and returned pool chemical products were stored in Building 5 along with dry raw materials (2,31,35). The wastes included ACL-60, ACL-90, lithium hypochlorite, sodium bisulfate, soda ash, and cyanuric acid (3,35). According to DHS, LACDHS reported that some of the waste drums were stored in Building 5 for more than two years (64). Additionally, waste oil was stored along the southern wall (3,21,22).

Release Controls

Building 5 was constructed on concrete with a metal roof (3).

History of Release

On September 3, 1988, LACDHS and Los Angeles County Fire Department responded to a fire at the Grow Group facility which was releasing a cloud of chlorine gas (5,6,25,26,33). According to the Los Angeles County agencies, a cloud, approximately 150 feet in the air, was emerging from Building 5 as a result of a fire (33). To halt the reaction, the reacting

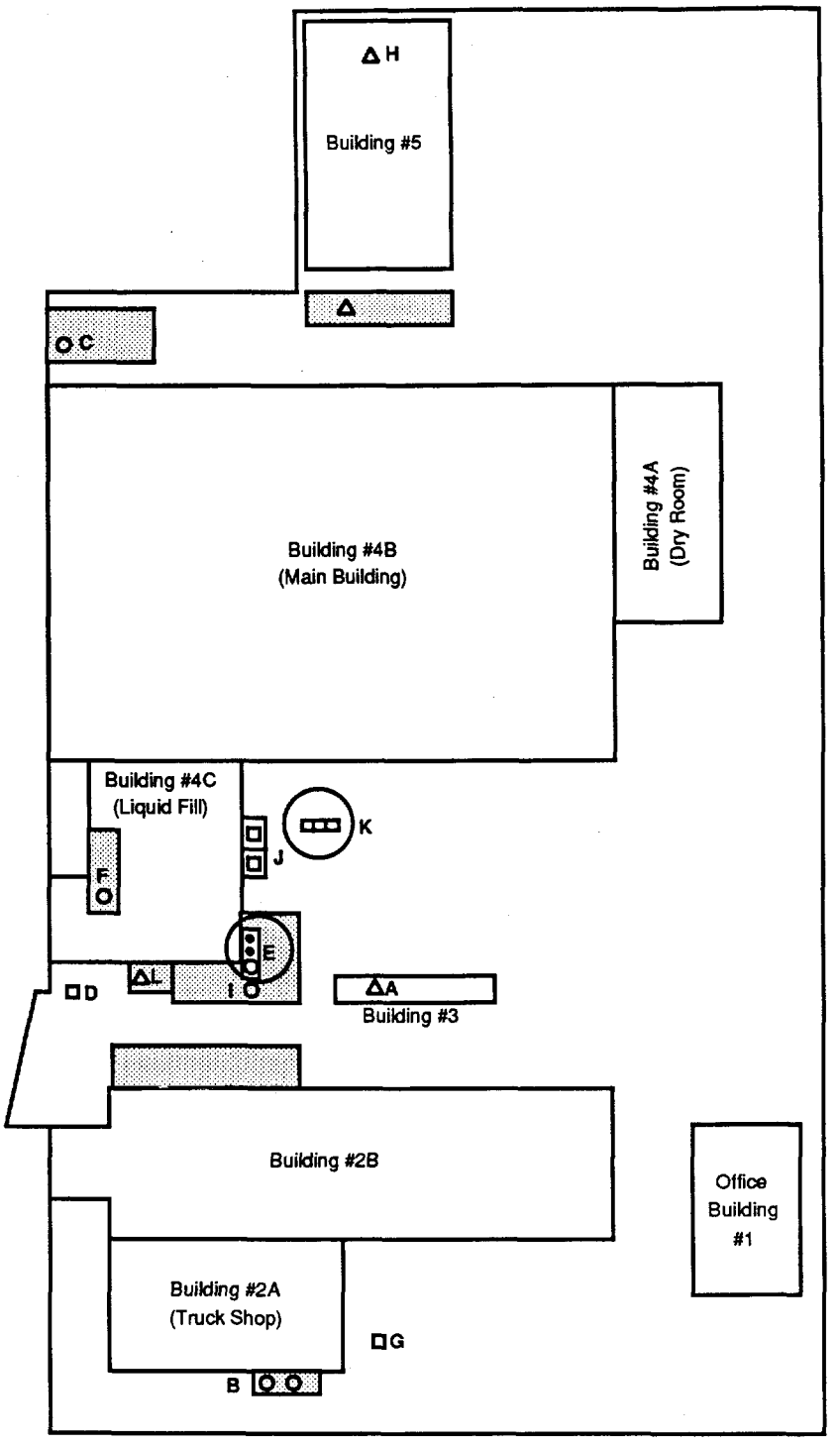

Figure 3 SWMU Locations Map

Grow Group, Inc.
Consumer Product Division
2501 Malt Avenue
Commerce, CA

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- Container Storage
- Above Ground Storage Tank
- Below Ground Storage Tank
- Containment/Stained Areas

Source: Grow Group, Inc. Closure Plan for Grow Group, Inc. Facility, 2501 Malt Avenue, City of Commerce, CA. June 1989.

material was spread on the floor of Building 5 and covered with a concentrated soda ash slurry (21). After the fire was put out using the soda ash slurry, SCAQMD collected air samples upwind and downwind from Building 5, and inside the building (see Table 1). A number of chlorinated compounds including chloroform, TCA, and perchloroethylene (PCE) (14). An inspection was conducted by DHS several days after the fire, and inspectors observed a thick, glassy layer of residue up to 0.5-inches thick in Building 5 (64).

TABLE 1
Analytical Results of Air Samples Collected By SCAQMD (in ppb)

Hazardous Substances	Downwind	Upwind	Inside Building 5
Trichloromethane (chloroform)	0.4	ND	1.8
1,1,1-Trichloroethane (methyl chloroform)	10.6	10.9	10.8
Tetrachloromethane (carbon tetrachloride)	0.44	0.24	0.71
1,1,2-Trichloroethene (trichloroethylene)	0.42	0.40	0.45
Tetrachloroethene (perchloroethylene)	1.73	1.81	1.74
Dichloromethane (methylene chloride)	292	ND	308
1,2-Dichloromethane	ND	ND	ND
1,2-Dibromoethane	ND	ND	ND

The sample locations are not known
ND = Not Detected

Source: Ecology and Environment, Inc. to Lewis, William, U.S. Environmental Protection Agency. Grow Group, Inc. On-Scene Monitoring, Commerce, CA. September 21, 1988.

Although this area was reportedly cleaned by Grow Group employees, there has been no known sampling conducted to confirm the removal of residual hazardous substances (21,22). There also has been no known soil or groundwater sampling conducted in the vicinity of Building 5.

4.1.2 Dry Hazardous Waste Drum Storage Area/Building 3 (Figure 3, Area A)

Unit Description
Building 3 has three walls and is open to the north. The building is approximately 1,200 square feet in size, covered by a metal roof, and has concrete floors (2,3). Drums containing waste dry pool chemicals were placed between two concrete berms and were completely surrounded by a 6-foot high fence (2).

Date of Startup
Grow Group began using Building 3 in 1988 (2,3). There is no known available information indicating that GP used this building to store hazardous waste drums.

Date of Closure
Apparently Grow Group is currently using this drum storage area to store dry pool chemical wastes; however, according to Grow Group, the production of dry pool chemical product ceased in June 1991 (2).

Wastes Managed
Floor sweepings, returned dry pool chemical products, and dust from the dry chemical process area were collected and placed into drums (2). Building 3 was used to store these wastes which include lithium and calcium hypochlorite, sodium bisulfate, ACL-90, and ACL-60 (2,3). According to Grow Group, this waste is removed by Nash Salvage, Inc. (EPA ID# CAD990802993) and U.S.P.C.I (EPA ID# OKD981514474) within 90 days (2).

Release Controls
Building 3 has concrete floors and a metal roof. The storage area is located between two concrete berms (2,3). The floor of Building 3 slopes toward the unbermed side for drainage to the asphalt pavement which is sloped towards a drain which leads to the above-ground wastewater treatment system (3).

History of Releases
There have been no known releases at Building 3; however, there has been no known soil or groundwater sampling in this area.

4.2 Waste Neutralization Systems

4.2.1 Dry Pool Chemical Waste Neutralization Tank (Figure 3, Area I)

Unit Description
A 6,000-gallon above-ground polyethylene tank was used to neutralize dry pool chemical wastes including ACL-90, ACL-60, and lithium and calcium hypochlorite (3,36). Approximately 400 pounds of chemical waste was mixed with approximately 4,500 gallons of water for neutralization which was then discharged to the city sewer (36,59). This 6,000-gallon tank was used by GP and Grow Group (2,6).

Date of Startup
Apparently GP began operating this above-ground treatment system in June 1984 (6).

Date of Closure
Grow Group ceased using this tank in 1988 (2).

Waste Managed
Wastes neutralized in this tank included ACL-90, ACL-60, and lithium and calcium hypochlorite (8,31,36,59).

Release Controls
The tank was located on a concrete slab (2). Reportedly, this area is approximately 2,500-square foot in size (36).

History of Releases
Two releases occurred from the neutralization tank on February 21 and 22, 1986. The first occurred when GP added a calcium hypochlorite slurry to the neutralization tank too quickly and an explosion occurred reportedly releasing a 30-foot cloud of chlorine gas. A second explosion occurred when calcium hypochlorite fell off a loading apparatus and into the tank. The resulting explosion caused the tank's gate valve to fail, and 6,000 gallons of solution were released from the tank (7,29).

4.2.2 Below-grade Wastewater Treatment System (Figure 3, Area K)

Unit Description
A 7.6-feet by 5-feet by 12-feet deep, concrete, below-grade wastewater treatment system is located adjacent to the acid and caustic collection sumps (2). The wastewater treatment system consists of three interconnected sumps. This wastewater treatment system was used for pH adjustment prior to sewer discharge (6,32,60). When Grow Group began operating at the site, a bypass tank was installed so that wastewater could be diverted to the above-ground wastewater treatment system (see Section 4.2.4) (2).

Date of Startup
This system was described in GP's Hazardous Waste Facility permit application in 1980 when GP began operations (6,32).

Date of Closure
GP vacated the facility in 1986, and Grow Group reportedly never used the below-grade treatment system; however, the below-grade wastewater treatment system is currently present on site (2).

Waste Managed
Waste liquids drained from the caustic packaging area located in Building 4 and from the acid and caustic collection sumps were pumped to the below-grade treatment system (60).

Release Controls
The below grade sump was reportedly concrete. Additionally, a bypass tank diverts the wastewater from the below-grade treatment system to the above-ground treatment system (see Section 4.2.3) (2).

History of Releases
There have been no reported releases from this area; however, no known soil or groundwater sampling has been conducted.

4.2.3 Above-ground Wastewater Treatment System (Figure 3, Area E)

Unit Description
The wastewater treatment system consists of three above-ground storage tanks (two 2,000-gallon and one 6,000-gallon) located on a concrete slab adjacent to Building 4C (3,24). One 2,000-gallon tank, Tank 24, is used to store waste sodium hypochlorite solutions. The waste

sodium hypochlorite solutions in Tank 24 is tested for clarity, and if the waste caustic in Tank 24 is free of debris then it is pumped into a recycling tank for reuse in the facility's bleach process. Otherwise, the waste caustic is pumped into Tank 23, the 6,000-gallon tank, for pH adjustment. The treated waste caustic is then discharged to the city sewer system under permit. The other 2,000-gallon storage tank, Tank 25, is used to store rinsewater containing sodium hydroxide (24). The sodium hydroxide rinsewater in Tank 25 is pH adjusted and then discharged to the city sewer system (24).

Date of Startup
The three tanks were installed in 1983 by GP (24).

Date of Closure
Grow Group is currently using this system but planned to cease all bleach and liquid pool chemical product manufacturing by August 1991 (2).

Waste Managed
Waste generated from spills occurring in the liquid chlorine bleach process area, including sodium hypochlorite, is pumped into Tank 24. Tank 25 stores rinsewater used to clean two sodium hydroxide storage tanks (24).

Release Controls
A 6-inch berm and a fence surround the wastewater treatment system. The capacity of the bermed area is approximately 1,650 gallons. The tanks are located on a concrete slab which slopes towards a sump. Liquid from the sump is then pumped back into the tanks. In addition, this bermed area is located in a depressed area of the yard which has a holding capacity of 16,000 gallons (24).

History of Releases
There have been no reported releases from this area; however, no known soil or groundwater sampling has been conducted.

4.2.4 Waste Hydrochloric Acid Storage Tank (Figure 3, Area F)

Unit Description
A 2,000-gallon storage tank, located in Building 4C , is used to collect acidic wash from the hydrochloric acid bottle filling operations area. The waste acid is used to adjust the pH in the wastewater treatment plant. When the pH of the wastewater in Tank 23 needs to be lowered, acid is pumped from this storage tank into Tank 23 (see Section 4.2.3) (24).

Date of Startup
The waste hydrochloric acid tank was installed in 1987 by Grow Group (24).

Date of Closure
As of August 1991, this unit was still active (2).

Waste Managed
Hydrochloric acid waste, generated from spills occuring at the bleach packaging area, is pumped from a floor sump into the hydrochloric acid waste storage tank (24).

Release Controls
A 6-foot high concrete wall surrounds the waste acid storage tank area. The storage capacity of the containment area is 7,000 gallons. The base of the acid storage tank area is covered with corrosive-resistant fiberglass (24).

History of Release
There have been no reported releases from this area; however, no known soil or groundwater sampling has been conducted.

4.3 Waste Oil Storage Areas

4.3.1 Waste Hydraulic Oil and Water Separator Tank (Figure 3, Area C)

Unit Description
A 1,000-gallon above-ground steel oil/water separator tank is located approximately 35 feet from the north property line in a 1,560-square foot bermed area. The berm is approximately 6-inches high and surrounds three sides of the tank (3,24). An elevated ramp borders the fourth side (24). According to GP's Part A Hazardous Waste Facility permit application, GP also used a 16-foot diameter tank to store hazardous waste in this area (6,32).

Date of Startup
The tank installation date is not known. GP began operating in 1980 (2,6).

Date of Closure
This tank is currently being used by Grow Group; however, Grow Group is in the process of closing the facilty (2).

Wastes Managed
Waste hydraulic and associated oils, generated from the blow mold machine, are piped into the oil and water separator tank (2,3). According to Grow Group, wastewater, which is separated from the oil, is discharged to the sewer system without further treatment. Apparently, the oil is pumped into 55-gallon drums and stored in the hazardous waste drum storage area located near Building 2B (see Section 4.3.2) (2). According to Grow Group, the oil is removed from the site within 90 days (3).

Release Controls
The area is bermed and has a concrete floor. The capacity of the bermed area is 5,000 gallons. A sump, adjacent to the separator tank, is used to pump spilled liquids from the bermed area back into the oil and water separator tank (24).

History of Releases
During the recent FIT site visit, oily liquid was observed within the bermed area (2). There has been no known soil or groundwater sampling conducted in this area.

4.3.2 Hazardous Waste Oil Tank and Drum Storage Area (Figue 3, Area B)

Unit Description
This area contains a 1,000-gallon steel waste oil tank and is surrounded with a 6-inch berm and 6-foot high fence. The area is asphalt-paved and contains a 1,000-gallon waste coolant water tank. Additionally, hazardous waste drums are currently stored in this area (2,3). According to Grow Group, the 1,000-gallon waste oil tank was used by GP only.

Date of Startup
GP began operations at the site in 1980 (2,6,24).

Date of Closure
GP vacated the site in 1986; however, hazardous waste drums are stored on pallets located next to the waste tanks. Grow Group is in the process of closing the facility (2).

Wastes Managed
Waste motor oil, collected from fork lifts and other vehicles, was pumped to the waste oil tank to separate the oil from any water (24). According to Grow Group, hazardous wastes drums containing the waste oil are stored in this area for less than 90 days (2,24).

Release Controls
This bermed area is located on asphalt pavement, and waste oil drums are stored on wooden pallets (2).

History of Release
Accoding to Grow Group, oil residue is located on the ashpalt (3). There has been no known soil or groundwater sampling conducted in this area.

4.3.3 Steam-cleaning Sump (Figure 3, Area G)

Unit Description
A 3,200-gallon concrete depression, located near Building 2B, the truck maintenance shop, was used for steam cleaning purposes (2,24). According to Grow Group, this sump was used when Grow Group operated a fleet of delivery trucks (2). Waste oil collected into the sump was eventually pumped into 55-gallon drums and apparently stored in the hazardous waste oil and drum storage area located at Building 2B (see Section 4.3.2) (2).

Date of Startup
Grow Group began operating at the site in 1986 (2). It is not known if this sump existed prior to 1986.

Date of Closure
Grow Group ceased using this sump in 1989 and currently using this area to store wooden pallets (2).

Waste Managed
Waste oil was collected in this sump (2,24).

Release Controls
This sump is a concrete depression (24).

History of Releases
There have been no reported releases from this area; however, no known soil or groundwater sampling has been conducted.

4.4 Area of Concern

FIT identified additional areas of concern at the site. These areas include a former drum storage area that was reportedly identified in GP's Part A Hazardous Waste Facility permit application; several secondary containment sumps used to contain spills from the bleach manufacturing area, the acid storage areas, and caustic storage areas; the baghouse; and various on-site areas (2,3,21,22,32,64).

GP's Former Drum Storage Area
Reportedly, GP stored drums of waste in a 20-foot by 40-foot concrete bermed area (see Figure 3, Area L) (3,32). Reportedly, this area is covered by a steel roof, and Grow Group reportedly never used this area (2,32). There is no available information indicating the type of wastes that were stored in this area (3). There have been no reported releases; however, no known soil or groundwater sampling has been conducted in this area.

Secondary Containment Sumps
A 1,600-gallon concrete below-grade sump, used as secondary containment, is located adjacent to two storage tanks formerly used by GP to store sulfuric acid (see Figure 3, Area D) (2). Grow Group reportedly did not use these storage tanks, and there is no available information discussing the date of installation of the tanks or the waste management practices associated with the tanks and the sumps (2).

Two additional secondary containment sumps are located on site (see Figure 3, Area J). A concrete caustic collection sump, approximately 7.5-feet by 5-feet by 4-feet deep, is divided into three cells and lies south of Building 4B. The sump is covered and a 2-foot square manhole covers each section of the sump. Adjacent to the caustic collection sump is a 3-foot diameter, 6.7 feet deep, concrete acid collection sump (60). Liquids, contained in both sumps, were pumped into the former below-grade wastewater treatment system by GP (2). Currently, waste from these units is pumped into the above-ground wastewater treatment system (2, 60).

These sumps are currently used to contain spills from pumping liquid bleach, caustics, or acids into storage tanks. For liquid bleach and caustics, tanker trucks unload the raw material over the caustic sump, and for unloading acids, the trucks pump over the acid sump (2). Additionally, floor drains, located in the acid-handling area of Building 4, discharge into the acid sump. Caustic-resistant concrete covers the caustic sump bermed area. An acid-resistant concrete covers the acid sump area (60).

There have been no reported releases from these secondary containment areas; however, no known soil or groundwater sampling has been conducted.

Baghouse System

A baghouse system was used to collect airborne dust from the dry pool chemical manufacturing area. Baghouse filters containing the dry pool chemical dust were placed in fiberboard drums and disposed of off-site (7). This system was identified in GP's 1980 Part A Hazardous Waste Facility permit application. According to GP, SCAQMD issued air permits for the baghouse system (32). There have been no reported releases from this system; however, there has been no sampling conducted.

Various On-site Areas

Several drums of ACL-60 and ACL-90 ignited at the Grow Group site, and to halt the reactions, the reacting material was spread onto the lot and covered with soda ash on several occassions (see Appendix C). The location of these areas is unknown. Additionally, during several DHS inspections, oily residue was observed along pipelines, a residue of hazardous materials was observed on the concrete floor of Building 5, and cracks were observed in the asphalt pavement (21,22,64). There has been no known sampling conducted at the site to confirm that all hazardous substances were removed from the site.

5. HRS FACTORS

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principle mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following HRS factors relative to this site.

5.1 Waste Type and Quantity

The Grow Group site is a bleach, pool chemical products, and plastic containers manufacturer (2,49). Materials used for bleach and pool chemical products manufacturing include ACL-60, ACL-90, lithium and calcium hypochlorite, cyanuric acid, sodium hydroxide, and hydrochlric acid (24,35). Wastes generated at the facility include waste oil, acidic and caustic wastewater, returned dry pool chemical product, dust, and floor sweepings (2,24,34). According to Grow Group, the facility generates 100 gallons of waste oil every month from maintaining machines and company vehicles (24). Although petroleum is excluded from the definition of "hazardous substance" and "pollutant or contaminant", this exclusion does not apply to waste oil that has been altered by use.

Approximately 2,000 gallons of acidic wastewater and 153,000 gallons of caustic wastewater are generated at the site every month (24). In 1988, approximately 245,440 pounds of dry pool chemical waste were removed from the facility in 552 drums (34). Some of this waste may have accumulated prior to 1986 (see Section 4 for details) (6,25,29,33).

Several drums of dry pool chemical waste, including ACL-90 and calcium hypochlorite, ignited at the site in 1988 (6,7,14,25,26,29,33). Gases including nitrogen chloride, chlorine, phosgene, and cyanogen chloride may have been released when the dry pool chemcial ignited (61). During the September 3, 1988 release, SCAQMD collected air samples which revealed the presence of chloroform (up to 1.8 ppb) and dichloromethane (up to 308 ppb) (14). A summary of the air sampling results is presented in Table 1.

5.2 Groundwater

The Grow Group site is located in the Central Groundwater Basin of the Los Angeles County Coastal Plain (1,37). The Central Basin is divided into four regions, and the site is situated within one of those regions, the Montebello Forebay region. The Montebello Forebay stratigraphy consists of 20 to 60 feet of sand and gravel overlying the Bellflower aquitard, an aquitard which consists of clays and sandy clays. The Bellflower aquitard, however, does not exist throughout the Montebello Forebay region and portions of the Bellflower aquitard contain high percentages of sand and gravel. These sand and gravel portions have relatively high permeabilities (37). The net annual precipitation in the area is 8 inches (38).

Several aquifers can be found throughout the Montebello Forebay region. These aquifers include the Artesia, Exposition, Gage, Gardena, Hollydale, Jefferson, Lynwood, Silverado, and Sunnyside. The Artesia and Exposition aquifers are located directly beneath the Bellflower aquitard and, like the aquitard, do not exist throughout the Montebello Forebay region. The Artesia and Exposition aquifers may not exist beneath the site. The Gage aquifer extends over approximately one-third of the forebay region and has a maximum depth of 260 feet bgs. Apparently, a sand and gravel layer, the Lakewood Formation, separates the Gage aquifer from the lower aquifers. Within two miles of the site the aquifers, the Gage, Gardena, Hollydale, Jefferson, Lynwood, and Silverado, appear to be hydraulically interconnected, and the Bellflower aquitard is not continuous. The depth to groundwater is approximately 90 feet bgs (37).

Ten water purveyors operate a combined total of 79 groundwater wells to provide drinking water to a total population of approximately 436,000 residents within the cities of Montebello, Commerce, Bell Gardens, Downey, Whittier, Hollydale, Norwalk, Pico Rivera, and Rio Hondo (see Table 2) (39,40,41,42,43,44,45,46,47,48,50,51,52). The closest well to the site is operated by Park Water Company and is located approximately 0.75 miles from the site (1,46). Approximately 20% of the drinking water supply for Park Water Company is groundwater and is used to serve approximately 57,000 residents of the cities of Bellflower and Norwalk (39).

TABLE 2
Water Purveyor Information

Water Purveyor	Number of Wells Within Specified Distance Ring (miles)						Total Wells In System	% Surface Water Used by System	Total Population Served by System
	0-¼	¼-½	½-1	1-2	2-3	3-4			
Park Water Company			1				9	80	57,000
Suburban Water System				1			1	84	100,000
La Habra Heights County Water Dist.						4	4	10	12,800*
City of Pico Rivera				3	1	5	10	0	29,700
South Montebello Irrigation Dist.					1		3	0	13,000
Pico Rivera Water Dist.					3	3	6	0	17,600
City of Downey				2	7	9	20	10	91,444
City of Santa Fe Springs						1	3	0	100,000***
Southern California Water Co.						4	20	50	36,960**
San Gabriel Valley Water Company						1	3	45	24,400

* This population includes 40% of the population of the Orchard Dale Water District, (ODWD) since ODWD receives 40% of its drinking water from La Habra Heights County Water District. 40% of 17,000 = 6,800. (Peters, Belinda, ICF Technology, Inc. and Draper, Gary Orchard Dale Water District. Telephone conversation. April 11, 1991; Peters, Belinda, ICF Technology Inc. and Frey, Jim, La Habra Heights County Water District. Telephone conversation. April 11, 1991).

** This population figure estimates 4 people served by each service connection (Jensen, Gary ICF Technology, Inc. and Lu, Alice, Southern California Water Company. Telephone conversation. May 13, 1991; and California Department of Water Resources. Watermaster Service Central Basin Los Angeles County. July 1, 1988 to June 30, 1989).

*** This includes the estimated business population.

Several water purveyors (South Montebello Irrigation District, City of Pico Rivera Water District, Pico Rivera Water District, and Santa Fe Springs) use 100% groundwater to supply drinking water to approximately 160,300 residents (44,45,47,48). The La Habra Heights County Water District and the City of Downey blend approximately 10% surface water with groundwater for drinking water supplies which serve over 100,000 residents (43,50). The Southern California Water Company operates a water system which blends 50% surface water with groundwater to provide a drinking water supply for their customers, and San Gabriel Valley Water Company uses 45% surface water in their drinking water supply. These two systems serve a combined population of 61,000 residents (41,52). The Suburban Water System serves 100,000 residents and uses 84% surface water in the drinking water supply (40). Approximately 46 groundwater wells are located within 4 miles of the site (1,39,40,41,42,43,44,45,46,47,48,50,51,52).

The potential for a release of hazardous substances to groundwater exists because several spills have occurred at the site, and according to DHS, the paved areas of the site contain cracks (6,7,21,22). However, no known groundwater sampling has occurred at the site.

5.3 Surface Water

The potential for a release of hazardous substances from the site to surface water appears to be low because there are no known downslope surface water bodies located within 2 miles of the Grow Group site (1). The City of Commerce is located in a "Zone C" flood plain, which is equivalent to flooding less frequently than every 500 years (53). The 2-year, 24-hour rainfall for the area is 3.3 inches (54).

5.4 Soil Exposure

The site is located in an industrial area of Commerce (2). Approximately 7,289 residents live within 1 mile of the site (55). The potential for a soil exposure incident appears to be low at this time because the facility is completely paved and fenced (2).

5.5 Air

Approximately 365,402 residents live within 4 miles of the site, and 150 people were employed by Grow Group prior to layoffs in 1990 (see Table 3) (2,55).

Several releases of chlorine gas have occurred at the facility after dry pool chemical wastes reacted and ignited (6,7,14,25,26,29,33). After the February 1986 incident, 12 employees from an adjacent facility were reportedly treated at a hospital and released (29). Thirty-one people complained of chlorine exposure and were treated at hospitals after the September 1988 incident. Twenty-nine of the 31 people were released after observation, and 2 people were released the follwing day (62). Additionally, during the September 1988 incident 23,000 residents and workers located within 1 mile of the site were evacuated by the Los Angeles County Fire Department (14).

TABLE 3 Population Within 4 Miles of Grow Group	
Distance (miles)	**Population**
On-Site	150
0-¼	0
¼-½	1,792
½-1	5,497
1-2	50,555
2-3	142,769
3-4	164,789

Two state threatened or endangered species, the Bank swallow (*Riparia riparia*) and Lyon's pentachaeta (*Pentachaeta lyonii*), and two federally proposed endangered species, Manystemmed dudleya (*Dudleya multicaulus*) and San Diego horned lizard (*Phrynosoma coronatum blainvillei*), live in habitats within 4 miles of Grow Group (1,56).

Reportedly, Grow Group currently holds air permits which were issued by SCAQMD (2). However, it appears that a release of hazardous substances to air has occurred because air samples, collected by SCAQMD from inside Building 5 in September 1988, revealed the presence of elevated levels of chloroform (up to 1.8 ppb) and methylene chloride (up to 308 ppb) (see Table 1). These chemicals were detected at levels significantly above samples collected upwind of Building 5. The levels of hazardous substances found in downwind samples were also higher than found in upwind air samples (14). The specific air sampling locations are not known. Additionally, a LACDHS inspector observed a thick cloud assumed to be chlorine approximately 150 feet in the air emerging from a shed located at the site during the September 1988 release (33).

Due to the past releases of hazardous substances to the air from an on-site source and since similiar substances are currently stored at the facility, the potential for a future release to the air exists.

6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

6.1 Agencies Contacted

Agencies contacted by FIT included DHS and RWQCB (57,58). File searches were conducted at DHS and RWQCB. Information obtained from the various agencies is provided throughout this report and in Appendix A.

6.2 Reconnaissance Observations

On August 6, 1991, ICF FIT members Janine Young and Yoon Toh interviewed Mr. Gary Eagleson, Mr. Don Green, and Mr. Henry Jones of Grow Group, Inc. (2). The purpose of this investigation was to collect information on facility manufacturing processes and current waste handling and raw material storage practices. Information obtained during the interview is provided throughout this report and in Appendix B.

FIT conducted on a tour of the facility on August 7, 1991 (see Appendix B). FIT noticed that packages of ACL-90 are being stored by Grow Group in Building 4, and waste ACL-90 is stored in the current hazardous waste drum storage area, Building 3, in 5-gallon plastic containers. Empty packaging materials are currently being stored in Building 5, the former hazardous waste drum storage area (2). Photographs taken during the site tour are presented in Appendix D.

7. EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415 (b)(2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment. On September 3 and 4, 1988, the EPA Emergency Response Section responded to a chlorine gas release (14). At this time, referral of this site to EPA's Emergency Response Section does not appear to be necessary because the facility is undergoing closure with oversight from DHS.

8. SUMMARY OF HRS CONSIDERATIONS

Grow Group, Inc. Consumer Products Division (Grow Group) is located at 2501 Malt Avenue, Commerce, California. Grow Group is located in an industrial area and has been manufacturing bleach, pool cleaning products, and plastic bleach containers since August 1, 1986. From 1980 until 1986, Georgia-Pacific (GP) operated as an anti-freeze, bleach, and pool cleaning products manufacturer at the site. There is no available information discussing site operators and operations prior to 1980. GP submitted a RCRA Part A Hazardous Waste permit application in 1980 to the U.S. Environmental Protection Agency (EPA) but never received an Interim Status Document (ISD) from the California Department of Health Services (DHS). The site is listed in the RCRA database as a Part A Hazardous Waste Facility permit application withdrawal candidate.

Raw materials used at the Grow Group site included calcium and lithium hypochlorite, sodium dichloro-S-triazinetrione (ACL-60), trichloro-S-triazinetrione (ACL-90), 1,1,1-trichloroethane (TCA), hydrochloric acid, sulfuric acid, sodium hydroxide, and cyanuric acid. Several different wastestreams are generated by current on-site processes. In the bleach process area, trenches are used to collect spills, and these spills are pumped into the above-ground wastewater treatment system prior to discharge to the city sewer. Floor sweepings and airborne dusts, collected from the dry pool chemical processing area, are placed into

drums and stored in Building 3. Waste oil, generated from the blow mold machine's hydraulics, is collected in an on-site oil and water separator tanks.

Ten water purveyors operate a combined total of 79 groundwater wells to provide drinking water to a total population of approximately 436,000 residents within the cities of Montebello, Commerce, Bell Gardens, Downey, Whittier, Hollydale, Norwalk, Pico Rivera, and Rio Hondo. The closest well to the site is located approximately 1.75 miles from the site, and approximately 46 groundwater wells are located within 4 miles of the site. The potential for a release of hazardous substances to groundwater exists because several spills have occurred at the site.

The potential for a release of hazardous substances from the site to surface water appears to be low because there are no known downslope surface water bodies located within 2 miles of the Grow Group site.

Approximately 7,289 residents live within 1 mile and 365,402 residents live within 4 miles of the site. The potential for a soil exposure incident appears to be low at this time because the facility is completely paved and fenced, and all documented spills were reportedly cleaned up. However, an observed release of hazardous substance to air can likely be documented because air samples, collected in September 1988 by South Coast Air Quality Management District, revealed the presence of elevated levels of chloroform (up to 1.8 ppb) and methylene chloride (up to 308 ppb). Additionally, a LACDHS inspector observed a thick cloud approximately 150 feet in the air emerging from a shed located at the site. Thirty-one people complained of chlorine exposure, and 23,000 residents and workers were evacuated by the Los Angeles County Fire Department during the September 1988 incident.

The significant HRS factors associated with the Grow Group site are:

- an observed release to air can likely be documented;
- large resident population located within 4 miles of the site;
- potential for a release of hazardous substance to groundwater exists; and
- groundwater within 4 miles of the site is used by a large population.

9. EPA RECOMMENDATION

	Initial	Date
No Further Remedial Action Planned (CERCLA)		
Higher Priority SSI (CERCLA)		
Lower Priority SSI (CERCLA)		
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	RL	11/19/91

Notes:

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APPENDIX A

Contact Log
and
Contact Reports

PA/SI Contact Log

Facility Name: Grow Group, Inc.
Facility ID: CAD085393080

Name	Affiliation	Phone #	Date	Information
*Gene Shafer	Suburban Water Systems	(213) 918-1231	04/10/91	Suburban Water Systems Well #410 is the only active well. This well provides 10% to 16% of the drinking water supply to approximately 100,000 customers.
*Bob McCloud	San Gabriel Valley Water Company	(818) 448-6183	04/10/91	See Contact Report
*Gary Lynch	Park Water Company	(213) 923-0711	04/10/91	See Contact Report
*Bill Oblasney	City of Pico Rivera Water Department	(213) 801-4415	04/10/91	See Contact Report
*Jim Frey	La Habra Heights County Water District	(212) 697-6769	04/11/91	See Contact Report
*Gary Draper	Orchard Dale Water District	(213) 941-0114	4/11/91	See Contact Report
*Ron Hughes	City of Santa Fe Springs	(213) 868-0511	4/12/91	See Contact Report
*Joe Dermody	Pico Rivera Water District	(213) 692-3756	04/12/91	See Contact Report
*Tom Sinclair	South Montebello Irrigation District	(213) 721-4735	04/12/91	See Contact Report
*Eric Zandvliet	City of Downey Water Department	(213) 869-7331	04/15/91	See Contact Report
Satish Gulati	California Department of Health Services	(818) 567-300	05/05/91	DHS has file information on Grow Group.
*Alice Lu	Southern California Water Company	(213) 929-2671	05/13/91	Surface water supplies 50% of the drinking water. There are 20 wells which serve the Santa Fe Springs area. There are approximately 9,240 service connections.

"Marie"	City of Commerce, City Hall	(213) 722-4805	05/16/91	The City of Commerce is located in a "C" flood zone, which is equivalent to flooding less than every 500 years.
Gary Eagleson	Grow Group	(213) 724-6530	06/10/91	See Contact Report
Chris Pires	Ecology and Environment, Inc.	(415) 777-2811	04/91	A file search was completed at RWQCB by E&E FIT. RWQCB did not have any files on Grow Group, Commerce.

* Past Contact Report Used to Evaluate Current Site

CONTACT REPORT

Agency/Affiliation: San Gabriel Valley Water Company (SGVWC)

Department/Region: Whittier Branch

Address/City: P.O. Box 6010, El Monte

County/State/Zip: Los Angeles County, California 91734

Contact	Title	Phone
Bob McCloud		(818) 448-6183

ICF Person Making Contact: Belinda Peters Date: April 10, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from United States Printing Ink Corporation, CAD083822346) EPA ID#: CAD085393080

The Whittier district of SGVWC serves areas within 4 miles of Santa Fe Springs. This district is supplied by 100% groundwater. Seventy-four hundred service connections or approximately 24,400 residents are served by 3 active wells within this system.

Well A: 6135 Pioneer Avenue, Whittier/2,200 gpm/462 feet deep, screened at 205-318', 336-416', 434-444', and 457-462' bgs.

Well B: 6135 Pioneer Avenue, Whittier/3,500 gpm/552 feet deep, screened at 170-520' bgs.

Well C: 10,509 Dunlap Crossing, Whittier/3,700 gpm/552 feet deep, screened at 180-542' bgs.

There are also 2 inactive wells, one at each location. These wells were closed due to low production.

CONTACT REPORT

Agency/Affiliation: Park Water Company (PWC)

Department/Region:

Address/City: P.O. Box 7002, Downey

County/State/Zip: Los Angeles County, California 90241

Contact	Title	Phone
Gary Lynch		(213) 923-0711

ICF Person Making Contact: Belinda Peters Date: April 10, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from United States Printing Ink Corporation, CAD083822346) EPA ID#: CAD085393080

In the Norwalk/Bellflower system of PWC, drinking water supply is made up of 80 percent water purchased from Metropolitan Water District, and 20 percent groundwater. PWC has 9 active wells and 10 standby wells which are used less than once a year. Approximately 57,000 residents are served by this supply.

CONTACT REPORT

Agency/Affiliation: City of Pico Rivera (PRWD)

Department/Region: Water Department

Address/City: 6615 Passons Avenue, Pico Rivera

County/State/Zip: Los Angeles County, California 90660

Contact	Title	Phone
Bill Oblasney		(213) 801-4415

ICF Person Making Contact: Belinda Peters Date: April 10, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from United States Printing Ink Corporation, CAD083822346) EPA ID#: CAD085393080

The drinking water supplied by PRWD is 100 percent groundwater. There are 10 active wells and 2 inactive wells in the system. One inactive well is currently undergoing extensive repair and the second was closed due to a problem with sand. PRWD serves water to 9,000 service connections, approximately 29,700 residents.

Well #1: 8739 Gallatin Road/2,800 gpm
Well #2: 8739 Gallatin Road/2,500 gpm
Well #3: 8316 Washington/3,000 gpm
Well #4: 8316 Washington/2,050 gpm
Well #5: 8305 Slauson/1,500 gpm
Well #6: 8231 Elmont/650 gpm
Well #7: 8523 Ceylon/800 gpm
Well #8: 9623 Telegraph/500 gpm
Well #9: 9732 Lundahl/3,000 gpm
Well #10: 9732 Lundahl/2,200 gpm

CONTACT REPORT

Agency/Affiliation: La Habra Heights County Water District (LHHCWD)

Department/Region:

Address/City: 1271 Hacienda Boulevard, La Habra Heights

County/State/Zip: Los Angeles County, California 90631

Contact	Title	Phone
Jim Frey		(213) 697-6769

ICF Person Making Contact: Belinda Peters Date: April 11, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from United States Printing Ink Corporation, CAD083822346) EPA ID#: CAD085393080

LHHCWD combines 10 percent imported water from the Metropolitan Water District with 90 percent groundwater pumped from 4 wells. All 4 wells are located at 10550 Dunlap Crossing Road in Whittier. LHHCWD maintains 1 stand-by well with no pump which hasn't been used in more than 12 years.

Well #2: 725 gpm/perforated at 75-95', and 230-305' bgs.

Well #5: 896 gpm/perforated at 75-85', 200-212', 245-289', 548-580', and 600-611' bgs.

Well #8: 1,300 gpm/perforated at 120-121', 175-185', 199-212', 224-258', 265-285', 216-322', 345-376', 455-460', 550-572', 578-592', and 616-625' bgs.

Well #9: 1,649 gpm/perforated at 184-188', 200-211', 261-294', 350-382', 457-463', 630-635', 645-654', and 670-698' bgs.

Well #8 is currently undergoing repair and will go back on line in May 1991. The population served by the system is approximately 6,000 residents.

CONTACT REPORT

Agency/Affiliation: Orchard Dale Water District (ODWD)

Department/Region:

Address/City: 13819 Telegraph Road, Santa Fe Springs

County/State/Zip: Los Angeles County, California 90604

Contact	Title	Phone
Gary Draper		(213) 941-0114

ICF Person Making Contact: Belinda Peters Date: April 11, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from United States Printing Ink Corporation, CAD083822346) EPA ID#: CAD085393080

ODWD operates no groundwater wells. They obtain 60 percent of their water from the Metropolitan Water District and they purchase the remaining 40 percent from the La Habra Heights County Water District. The ODWD supply serves approximately 15,000 to 17,000 residents in a 2 square mile area.

CONTACT REPORT

Agency/Affiliation: Pico Rivera Water District (PRWD)

Department/Region:

Address/City: 4843 South Church St. Pico Rivera

County/State/Zip: Los Angeles County, CA 90660

Contact	Title	Phone
Joe Dermody	Field Superintendent	(213) 697-3756

ICF Person Making Contact: Gary Jensen Date: April 12, 1991

Subject: Groundwater/Drinking Water Sources

Site Name: Grow Group, Inc. (from Whittier Plating Company, CAD008495129) EPA ID#: CAD085393080

PRWD obtains all its water from 6 active groundwater wells. PRWD serves approximately 5,200 service connections which correspond to a population of approximately 17,600. The wells are located at the following addresses:

#2 4852 S. Church St.

#4A 9512 Bragher

#5A 6708 Rosemead Blvd.

#7 9036 Arma

#8 5514 Paramount Blvd.

#9A 4823 Lexington

All wells are located in Pico Rivera.

CONTACT REPORT

Agency/Affiliation: South Montebello Irrigation District (SMID)

Department/Region:

Address/City: 864 West Washington Blvd., Montebello

County/State/Zip: Los Angeles County, California 90640

Contact	Title	Phone
Tom Sinclair	General Manager	(213) 721-4735

ICF Person Making Contact: Gary Jensen Date: April 12, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (form Whittier Plating Company, CAD008495129) EPA ID#: CAD085393080

SMID obtains all its groundwater from 3 active wells located in Rio Hondo. Each well supplies approximately equal portions of the total supply to approximately 12,000 to 13,000 people.

CONTACT REPORT

Agency/Affiliation: City of Santa Fe Springs

Department/Region: Water Department

Address/City: 11710 Telegraph Rd., Santa Fe Springs

County/State/Zip: Los Angeles County, CA 90670

Contact	Title	Phone
Ron Hughes		(213) 868-0511

ICF Person Making Contact: Gary Jensen Date: April 12, 1991

Subject: Groundwater Information

Site Name: Grow Group, Inc. (from Whittier (Plating Company, CAD008495129) EPA ID#: CAD085393080

Well #1 is the closest City of Santa Fe Springs well to the Whittier Plating site. The well is approximately 984 feet deep. It is perforated at several depths, the shallowest at 273 feet below ground surface (bgs).

The well log for well #1 indicates the following soils stratigraphy.

0 to 13 ft. bgs - sand and gravel
13 to 75 ft. bgs - clay
75 to 108 ft. bgs - sand and gravel
108 to 121 ft. bgs - clay
121 to 143 ft. bgs - sand
143 to 173 ft. bgs - clay
173 to 193 ft. bgs - sand & gravel
193 to 273 ft. bgs - clay

There are 3 active wells in the system which provide approximately 45% of the drinking water. Approximately 11,000 residents are served by the system, and during the day the business population reaches approximately 100,000.

CONTACT REPORT

Agency/Affiliation: City of Downey Water Department

Department/Region:

Address/City: 11111 Brookshire Ave. Downey CA

County/State/Zip: Los Angeles County, California 90241

Contact	Title	Phone
Eric Zandvliet	Water Engineer	(213) 869-7331

ICF Person Making Contact: Gary Jensen Date: April 15, 1991

Subject: Groundwater/drinking water supply information

Site Name: Grow Group, Inc. (from Whittier Plating Company, CAD008495129) EPA ID#: CAD085393080

There are 5 active wells which supply 70% of Downey's drinking water to approximately 91,444 people. Mr. Zandvliet will send a map indicating the locations of the wells.

CONTACT REPORT

Agency/Affiliation: Grow Group, Inc.

Department/Region:

Address/City: 760 S. Vail Ave., Montebello

County/State/Zip: Los Angeles, CA

Contact	Title	Phone
Gary Eagleson	Regulatory & Environmental Safety Manager	(213) 724-6530

ICF Person Making Contact: Janine Young Date: June 10, 1991

Subject: Grow Group, Inc.

Site Name: Grow Group, Inc. EPA ID#: CAD085393080

The Commerce facility is a bleach manufacturing facility. Chlorine is mixed with sodium hydroxide to manufacture liquid bleach. Oxidizers are used to manufacture dry pool chemicals. Plastic containers are also produced at the facility by using a blow mold machine.

APPENDIX B
SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

ICF Technology, Inc.
Field Investigation Team (FIT)
160 Spear Street, Suite 1380
San Francisco, CA 94105
(415) 957-0110

OBSERVATIONS MADE BY: DATE: August 7, 1991

Janine Young and Yoon Toh, ICF Technology, Inc.

FACILITY REPRESENTATIVE(S) and TITLE(S):

Gary Eagleson, Manager of Regulatory & Environment Affairs
Donald Green, Vice-President of Technical Services
Henry Jones, Manager of Environmental Affairs

SITE NAME: Grow Group, Inc. EPA ID#: CAD085393080
Consumer Product Division

The following information was obtained during the interview:

Grow Group has operated at the Commerce site since August 1, 1986. This facility was acquired from Georgia-Pacific. The facility is located on three separate properties, and each parcel has a separate owner. The owners are Goodyear Tire and Rubber Company, Georgia-Pacific Corporation, and Golden Trust. The Commerce facility manufacturers bleach and dry swimming pool products. Approximately 150 employees were working at the facility before Grow Group began laying-off workers in 1990. The entire facility is located on 7 acres of land.

Grow Group will discontinue bleach manufacturing at the Commerce facility in August 1991. Grow Group will terminate the lease with Georgia-Pacific and Goodyear Tire, and will become a packaged bleach and pool chemicals distribution facility. Three processes occurred at this facility: liquid bleach manufacturing, bleach bottle manufacturing, and pool chemicals manufacturing.

<u>Liquid Bleach Manufacturing Process</u>
Liquid chlorine is brought to the facility by railroad cars and caustics are delivered by tank trucks. The liquid chlorine is pumped from the railroad cars into lines and caustics are added to the line with large amounts of water. The liquid chlorine was stored in the railroad

cars and caustics are stored in an indoor tank farm. The manufactured bleach is stored in six 7,000-gallon storage tanks also located in the indoor tank farm. Filling Line #1 is used to fill containers with household bleach and pool chemicals. Filling Line #3 is used for muriatic (hydrochloric) acid which is used for pool cleaning purposes.

Bottle Manufacturing Process

Bottles used to package the bleach and pool chemicals were also manufactured at the facility. A polyethylene blow mold was used to produce the bottles. The machinery for the blow mold has been dismantled, and according to Grow Group, most of the equipment has been sold.

Pool Chemicals Process

A chemical, ACL-90, was purchased from a supplier and pressed into tablets and packaged in 2-pound bags. The purchased ACL-90 was stored in Building 2B. This dry pool chemical manufacturing ceased on June 30, 1991. The equipment used to produce the dry pool chemical tablets has been dismantled and will be sold.

Several wastestreams are generated at the facility. Trenches containing pumps are used to collect any spills from the processing area. This wastewater is pumped to the wastewater treatment system for pH adjustment. The system consists of two 2,000-gallon and one 6,000-gallon treatment tank. Grow Group is permitted by Los Angeles County to discharge treated wastewater to the city sewer under permit #11453UJ.

Georgia-Pacific also neutralized wastewater in a below-grade wastewater treatment system. This wastewater treatment system is a series of sumps connected to the sewer. Grow Group installed a tank to bypass the sumps. Wastewater is currently discharged to the bypass tank and is pumped to the current wastewater treatment system before being discharged to the sewer. An acid sump and caustic collection sump were located adjacent to the below-grade wastewater treatment system.

Waste oil is generated from the blow mold machine's hydraulic and filling lines. Oily water is collected in a 1,000-gallon oil/water separator tank. The separated water is sent to the POTW. The oil is collected in a vacuum truck and is currently hauled off site for recycling by Nash.

Grow Group operated a fleet of trucks until 1989 and waste oil was generated from truck maintenance. A 3,230-gallon sump was used for steam-cleaning operations. This truck sump is currently used to store pallets that need to be repaired.

Floor sweepings from materials that spilled on the floor of the pool tablets manufacturing area were drummed and hauled off site by Nash and U.S.P.C.I. (EPA ID#OKD981514479) and disposed of at U.S.P.C.I (EPA ID#OKD006548376). This floor sweeping waste has been stored in one-third of Building 3 since 1988. From 1986 until 1988, Grow Group stored the ACL-90 floor sweepings in Building 5. Grow Group did not know where Georgia-Pacific stored their ACL-90 raw materials, however, Georgia Pacific's ACL-90 waste was stored in a former drum storage area that was identified in a Part A permit application and located

outside of Building 4C. Grow Group did not know the dates that this storage area was used by Georgia-Pacific. This area was bermed to contain 1,000 gallons of spilled liquid. Grow Group never used this drum storage area.

Georgia-Pacific neutralized waste ACL-90 in a 6,000 gallon neutralization tank. Grow Group ceased using the neutralization tank after 1988.

Los Angeles County and the City of Commerce collect samples from the sewer connection at least once a year. According to Grow Group there have been no violations issued by the POTW. The South Coast Air Quality Management District conducts an annual inspection at the facility.

California Department of Health Services (DHS) is the lead agency at the facility. Since the manufacturing portions of the facility are being closed, a closure report, which addresses the sumps, underground wastewater treatment system, secondary containment areas, above-ground hazardous wastes storage tanks, and hazardous waste storage areas, will be submitted to DHS. Georgia-Pacific is not involved with the closure of the Commerce facility. There have been no soil or groundwater sampling investigations conducted at the

The following observations were made during the site reconnaissance visit:

Grow Group is located in an industrial area. The site is bordered by Hyster to the east, CCA to the south and west, and a parking lot to the north. Pool chemical products produced by Grow Group and displayed in a cabinet included algaecide, anti-foam, clarifier, pH addition, pH decreaser.

A former hazardous waste drum storage area used by Georgia Pacific was surrounded by a 2-inch berm and completely fenced. This fenced area also contained a waste coolant tank and a waste oil tank. Grow Group has not used the waste coolant or waste oil tanks. A metal canopy covered this area. Fifty-five gallon drums of hazardous waste oil are currently stored in this area next to the tanks. A steam-cleaning sump was covered with stacks of wood pallets.

A 1,616-gallon spill containment sump was located in front of two tanks that were used by Georgia-Pacific to store sulfuric acid. A concrete block wall (approximately 6 feet high) surrounded these storage tanks. Grow Group reportedly never used these storage tanks. All of the product tanks located at the facility were surrounded by a 6-foot high concrete wall.

A 2,000-gallon waste caustic tank was replaced for a 6,000-gallon waste caustic tank in 1989. The 6,000-gallon tank is located next to the two wastewater treatment tanks. A 4-inch high concrete berm surrounded this area, and the three tanks are surrounded with a fence. The 2,000-gallon tank was reportedly emptied and cleaned, and is currently being stored along the property's southern fence near the steam-cleaning sump.

Dry ACL-90 wastes are currently stored in Building 3. Building 3 is surrounded by three walls and covered with a roof. This area is surrounded with a 1-inch concrete berm on two sides. A 6-foot fence surrounds the area. Building 5 is currently used to store empty packaging material.

Bags of ACL-90 product are being stored in a small room located in Building 4. This area was used to manufacture dry pool chemical tablets. The tablet pressing machinery has been dismantled and removed. Located near the dry pool chemical manufacturing is the area which use to house the blow mold machine. The machinery for the blow mold has also been dismantled.

The oil/water separator tank is surrounded by a 4-inch concrete berm. Puddles of oily liquid are located within the berm. The area is surrounded by a 6-foot high fence.

APPENDIX C

SUMMARY OF INCIDENTS		
Date	**Agency(ies) Who Responded**	**Brief of Events**
2/20/86	LACDHS	A drum of ACL-90 ruptured and the material was swept up and placed into a fiberborad drum. The drum ignited when it became wet from rainfall. The drum was placed in a dumpster filled with water to stop the emissions of chlorine gas. The facility was ordered by LACDHS to reduce the amount of stored ACL-90 which had accumulated to approximately 130 fiberboard drums from the pool tablet manufacturing area.
2/21/86	LACDHS LACSD	An explosion occured in ACL-90 neutralization tank, releasing a 30-foot cloud of chlorine gas. The cloud dissipated within 5 to 10 minutes. Twelve employees from an adjacent facility complained of exposure. LACDHS ordered the neutralization operation to cease and the drums removed from the site immediately. Reportedly, over 100 drums were moved to Crosby and Overton storage yard. Twelve employees from adjacent facility complained of exposure to chlorine gas and were treated at a hospital.
2/22/86	LACFD LACDHS	In attempting to dissolve ACL-90 in a 6,000-gallon neutralization tank, a 300-pound drum of calcium hypochlorite fell off a loading apparatus into the neutralization tank and caused an explosion which blew a valve off the tank. Approximately 6,000 gallons of liquid were released on the lot. A 300-pound drum of calcium hypochlorite spontaneously oxidized and released a chlorine gas. GP employees poured the reacting material onto the parking lot and applied soda ash to halt the reaction. Four other drums of calcium hypochlorite began reacting.

6/2/87	LACDHS	An inspection was conducted because the County received a complaint of an alledged leaking drum on the Malt Avenue site. The inspector found a 55-gallon drum of resin leaking on the ground. The inspector also discovered unlabelled or not dated 55-gallon drums of waste solvents which were stored on site for more than 90 days.
3/30/87	LACDHS LACFD	An employee swept up some dry chlorine tablets with floor sweepings containing machine oil. This mixture was placed in a 5-gallon plastic bucket, and ignited releasing chlorine gas. The bucket was taken outside, and the material was spread on the lot and covered with soda ash to halt the reaction.
2/22/88	LACDHS LACFD	Refuse in a garbage truck caught on fire. Allegedly, liquid hydrochloric acid was dumped into the refuse. Grow Group was believed to be the source of the acid.
8/10/88	LACDHS LACFD Montebello FD SCAQMD DCS	Four 30-gallon fiber drums of ACL-90 ignited releasing a 0.25-mile chlorine gas cloud. The fire was extinguished by FD using a concentrated soda ash slurry. SCAQMD monitored the airborne emissions and reportedly issued a notice of violation to Grow Group.
9/3/88	LACDHS LACSD Montebello FD South Pasadena FD Monterey Park FD Santa Fe Springs FD San Gabriel FD TAT	Twenty-three thousand residents and workers were evacuated from the area by LACSD because of a release of chlorine gas from a 90-feet by 180-feet structure known as Building 5. This structure contained over 300 fiberboard drums. Eighty-three of the drums were damaged, and eight drums were involved with the reaction. SCAQMD collected air samples after the cloud dissipated. Approximately 31 people were hospitalized for exposure to chlorine gas. Twenty-nine people were released after two hours, and two individuals were kept overnight for observation.

9/4/88	LACDHS LACFD LACSD SCAQMD TAT	Approximately 1,000 residents were evacuated due to a second release of chlorine gas. This release occurred when contractors began shoveling the material from 09/03/88 into a hopper. Approximately 30 reacting drums of ACL-90 were neutralized by Grow Group employees from September 4 through September 6, 1988 under observation by LACDHS and TAT.
9/8/88 - 9/12/88	LACDHS	Approximately 552 drums containing 245,440 pounds of hazardous materials were removed from the site under observation by LACDHS.

LACDHS = Los Angeles County Department of Health Services
FD = Fire Department
LACSD = Los Angeles County Sheriff's Department
LACFD = Los Angeles County Fire Department
SCAQMD = South Coast Air Quality Management District
DSC = Disposal Service Corporation
TAT = Technical Assistant Team

Source: See the following references 6,7,14,25,26,28,29,30,31,34,59.

APPENDIX D

Photographic Documentation
taken by
Yoon Toh, ICF Technology, Inc.
on August 6, 1991
at 2:00 p.m.

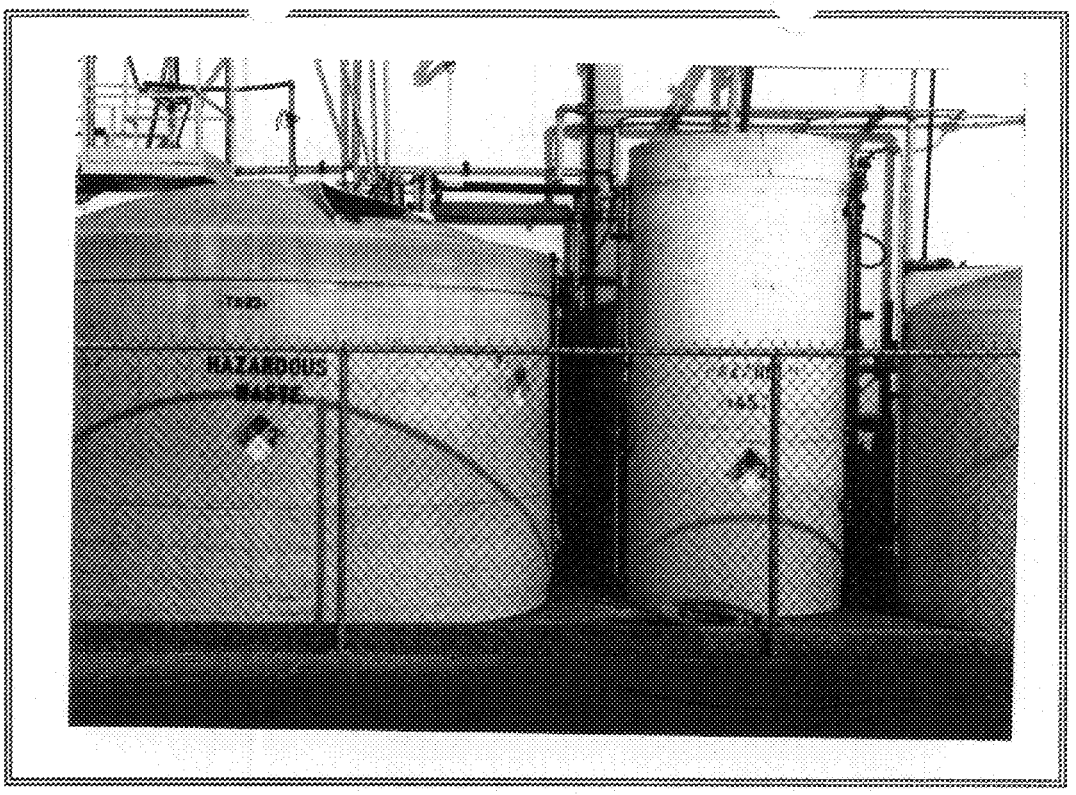


Photo 3: Current wastewater treatment system.

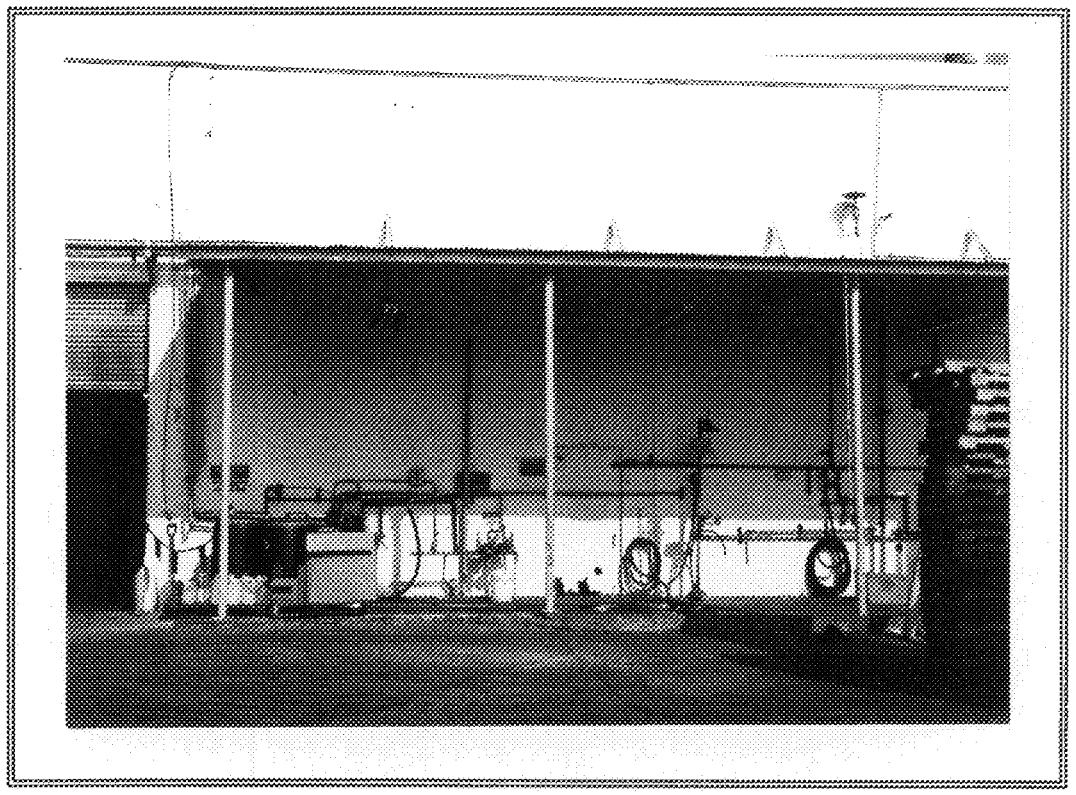


Photo 4: Former below-grade wastewater treatment system.

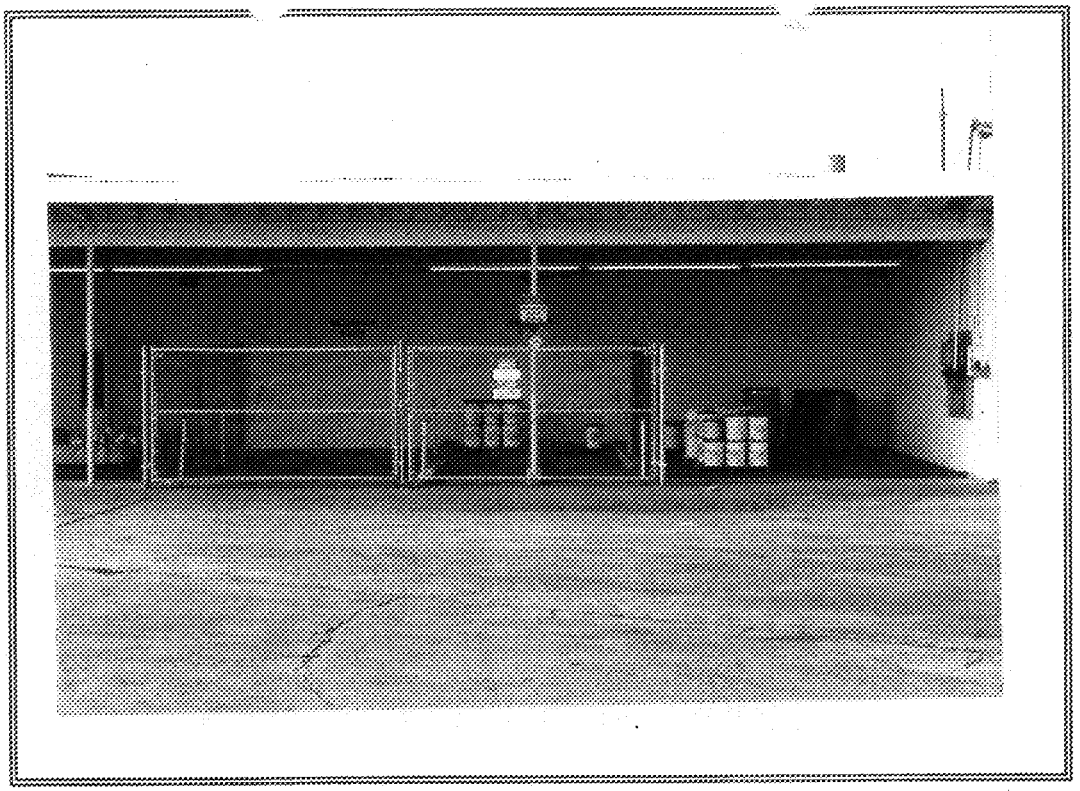


Photo 1: Current storage area for dry chemical wastes.

Photo 2: Current storage for drums of waste oil.

CLOSURE PLAN

for

GROW GROUP, INC. FACILITY

2501 Malt Avenue

City of Commerce, California

June 1989

TABLE OF CONTENTS

DIAGRAMS

TABLES

ATTACHMENT

1.0 INTRODUCTION

This closure plan has been developed to meet the California Department of Health Service's closure requirements for Grow Group's Commerce facility. Notwithstanding Grow Group's continuing position that it is a "generator only", the plan specifies those steps necessary to close hazardous waste management (HMUs) in accordance with Title 22 of the California Code of Regulations (Sections 67210 through 67220) as applicable to interim status facilities. Since Grow Group, Inc. will continue manufacturing operations under the "generator-only" status requirements following closure, many of the HMUs will remain in use for the same purposes, albeit under "generator-only" requirements. Therefore, in designing the closure activities presented in this plan, the primary focus has been to ensure that there is no contamination to surface or subsurface areas from HMUs and that no post closure care, maintenance, and/or control will be required.

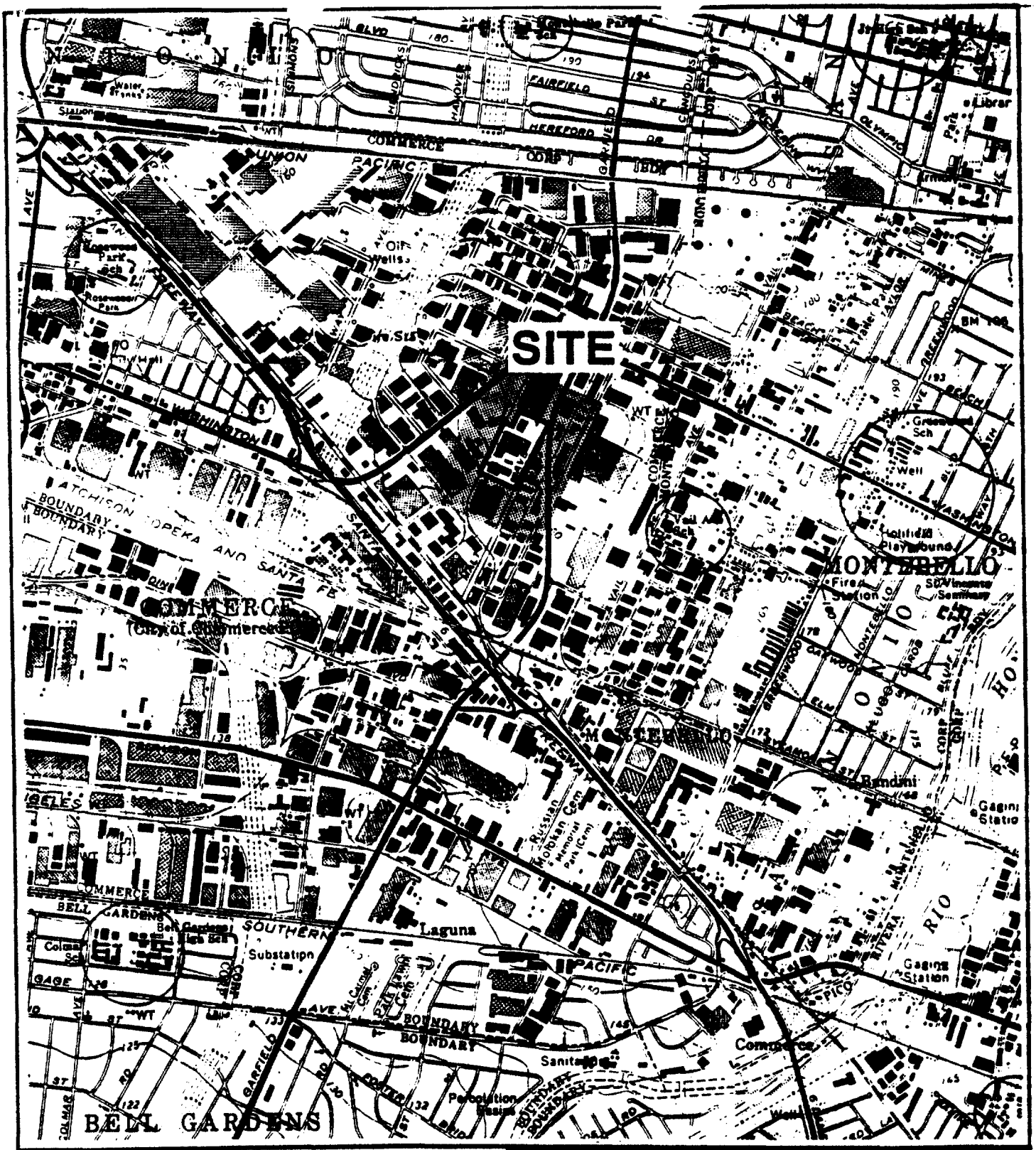
2.0 FACILITY DESCRIPTION

2.1 General Facility Information

The Grow Group, Inc. (GGI) facility, located at 2425-2501 Malt Avenue in the City of Commerce, is in a heavily industrialized area of Los Angeles County (see Diagram 1). Swimming pool maintenance chemicals, bleach, and related items are produced at the facility. The roughly 11 acre site is leased by GGI and houses five buildings. Various inorganic chemical products are manufactured, packaged, and warehoused at the Commerce facility. Processing activities consist primarily of: 1) repackaging products into various size containers; 2) forming dry materials into specific shapes; and 3) molding polyethylene resin into containers. Bleach production is the only true chemical manufacturing process. Composition of the final products (and any waste materials) are identical or nearly identical to that of the raw materials.

Raw materials arrive at the facility by truck and railcar. Liquid materials are transferred by pump into storage tanks. Dry materials are shipped in fiberboard drums, plastic drums, and meshed nylon sacks and stored in various warehousing areas. The majority of the raw materials are processed into bleaches and cleaners for both household and commercial/industrial use; swimming pool maintenance chemicals, such as dry and liquid chlorinators; and plastic containers for the previously mentioned products. Finished products are stored on-site for distribution to retailers and wholesalers. Additionally, some products produced at other GGI facilities are stored at the Commerce facility for eventual distribution.

Various maintenance activities take place at the facility. These include the servicing of the molding and pressing machines; forklift and vehicle maintenance; and building and grounds upkeep.



REFERENCE: USGS 7.5 MINUTE SERIES
EL MONTE QUADRANGLE 1981
LOS ANGELES QUADRANGLE 1981
SOUTH GATE QUADRANGLE 1981
WHITTIER QUADRANGLE 1981

N

0 ¼ ½ 1 MILE

SCALE

ENSR

DIAGRAM 1

SITE LOCATION MAP
GROW GROUP, INC.
2501 MALT AVENUE
CITY OF COMMERCE, CALIFORNIA

DRAWN BY: DM	DATE: 5/5/89	PROJECT NO: 4770-001
CHK'D BY:	REVISED:	DWG.NO: FIGURE 1

As noted above, there are five buildings on-site. For ease of discussion, these are identified as follows:

- Building 1 - business office/administration
- Building 2 - vehicle truck maintenance shop and warehousing
- Building 3 - hazardous waste storage
- Building 4 - liquid/dry product manufacturing and warehousing
- Building 5 - warehousing of packaging components

These buildings and the general facility layout and orientation are depicted on the Site Plan (Diagram 2).

2.2 Site History

GGI acquired the operations in 1986 from the Georgia-Pacific Corporation (GP). In addition to those products currently produced by GGI, GP formerly manfactured antifreeze. Antifreeze production was discontinued in 1987. The antifreeze was manufactured in the outdoor aboveground tank farm located at the northwest corner of Building 2B. Most of the tanks contained ethylene glycol; however, phosphoric acid, sodium borate, and sodium mercaptobenzyothiazole were also stored. The operation is currently idle and all the tanks are inactive.

Records indicate that a Part A application was filed by GP with the EPA on November 11, 1980. Three processes were identified in the application and consist of: treatment of corrosive wastes in an underground sump; storage of 3,600 gallons of solvents, ignitable and reactive wastes in containers; and storage of an unknown waste in a tank adjacent to the cooling tower.

Neutralization of waste bleach or corrosives no longer occurs in the underground sump identified in GP's Part A. Now, the sump is used as a surge/collection tank before the wastes are transferred to an aboveground tank for neutralization. Hazardous wastes in containers are currently not stored in the area depicted on GP's Part A diagram. Heat exchanger units now occupy the area. The tank shown next to the cooling tower on GP's Part A diagram no longer exists. An aboveground oil/water separator tank currently is located in the same area.

2.3 Current Operational HMUs

There are three basic HMU operations currently conducted at the facility, as defined by The State of California. These are: 1) separation of waste oils from water in two above ground tanks; 2) elementary neutralization of waste sodium hypochlorite (bleach), sodium hydroxide (caustic tank bottoms) and muriatic acid in aboveground tanks before discharge to an industrial sewer system; and 3) storage of more than 5,000 gallons of hazardous wastes in tanks at any one time.

2.4 Description of HMUs

For purpose of this closure plan, HMUs will be those hazardous material and waste storage areas, tanks, containers, equipment and associated piping, valves and meters which are or were operated in a manner in which the California Department of Health Services views as inconsistent with generator-only status. These units include: drums, buckets or any container holding a hazardous waste or hazardous material residue for greater than 90 days; tanks used to store hazardous waste for greater than 90 days or, in combination with other waste tanks, store more than 5,000 gallons at any one time; tanks and associated equipment used to treat hazardous waste; and areas which show signs of hazardous material/waste spillage or leakage.

Twenty-five HMUs have been identified at the site. Table 1 lists the HMUs along with a brief description and a location reference. Diagram 2 depicts the location of the HMUs.

Table 1

HAZARDOUS WASTE MANAGEMENT UNITS/AREAS

Grow Group, Inc. Commerce Facility

Description	Current or Former Contents	Location Reference Number
ABOVEGROUND TANKS - Treatment/Storage		
1,000 gal steel tank	waste motor oil	1
1,500 gal steel tank	oily water	2
1,000 gal polypropylene tank	waste hydraulic oil	3
*6,000 gal polyolefin tank (22)	*TCI,DCI,CH & LH neutralization	4
6,000 gal polyolefin tank (23)	NaOH & NaOCl neutralization	5
2,000 gal polyolefin tank (24)	Weak wash NaOCl storage	6
2,000 gal steel tank (25)	NaOH sludge,*Na_2S storage	7
2,000 gal polyolefin tank (2)	weak wash HCl storage	8
SUMPS - Collection		
*3,200 gal concrete sump	steam cleaning runoff	9
1,600 gal concrete sump	storage area runoff	10
350 gal concrete sump	HCl & *H_2SO_4 solutions	11
1,120 gal concrete sump	NaOCl & NaOH solutions	12
3,400 gal concrete sump	NaOCl solutions	13
CONTAINER STORAGE/AREAS		
Empty & full drum storage	HCl, NaOH and others	14
Drum storage	TCI, DCI, CH and LH	15
*Drum storage	*waste hydraulic oil	16

Table 1 (cont.)

HAZARDOUS WASTE MANAGEMENT UNITS/AREAS

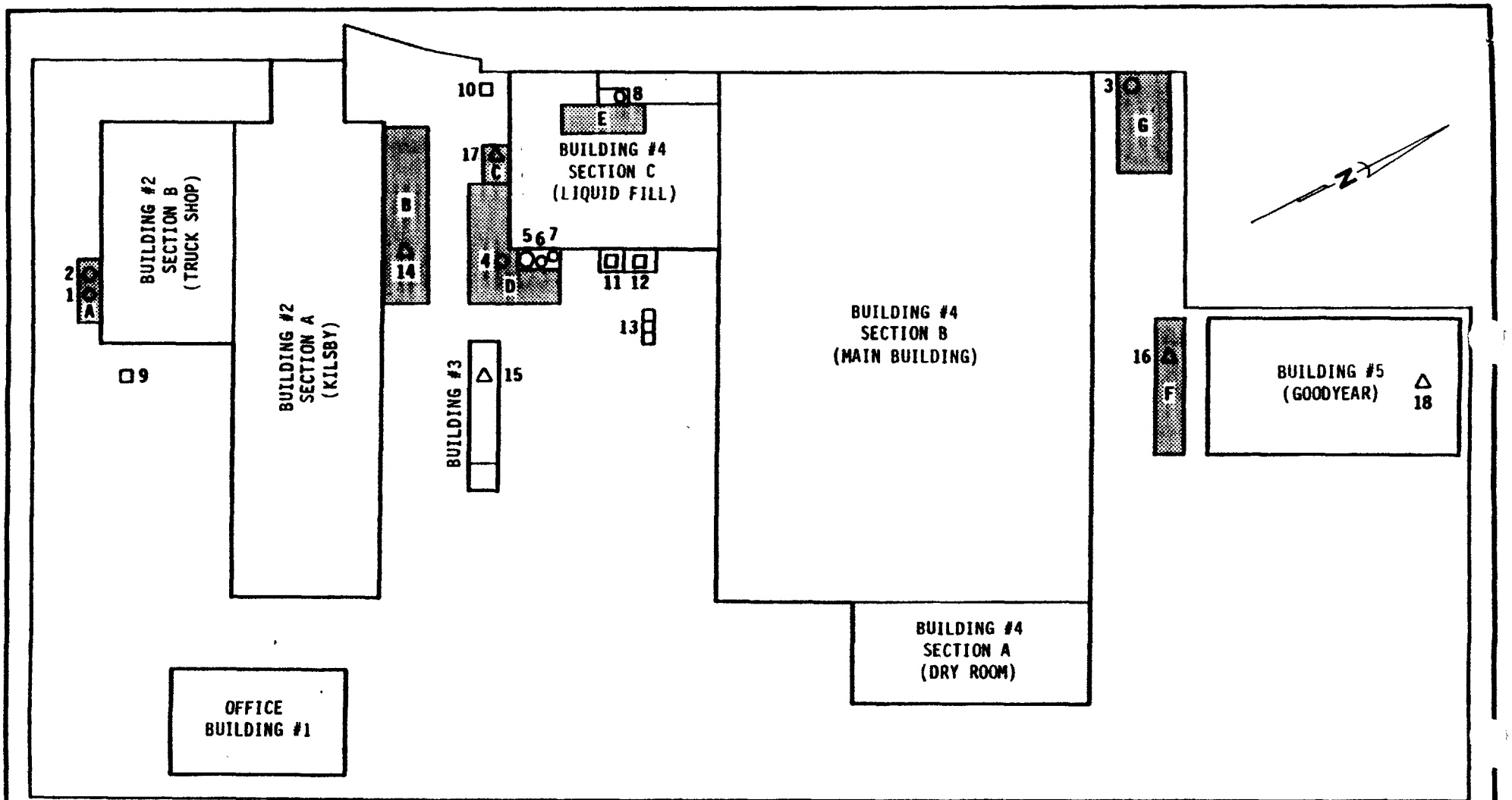
Grow Group, Inc. Commerce Facility

Description	Current or Former Contents	Location Reference Number
*Drum storage	various unknown GP wastes	17
*Drum storage	*TCI & DCI, etc.	18

CONTAINMENT AREAS

Containment area	waste oil tank	A
Containment area	empty drum storage	B
*Containment area	various GP waste storage	C
Containment area	treatment tanks	D
Containment area	muriatic acid tank	E
*Containment area	*waste hydraulic oil	F
Containment area	waste hydraulic oil	G

* denotes former use/storage
TCI = trichloroisocyanuric acid
DCI = dichloroisocyanurate
CH = calcium hypochlorite
LH = lithium hypochlorite
NaOCl = sodium hypochlorite
NaOH = sodium hydroxide
H2SO4 = sulfuric acid
Na2S = sodium sulfite
HCl = muriatic acid



MALT AVENUE

SCALE

0 50 100 200 FEET

EXPLANATION

- △ CONTAINER STORAGE
- ○ ABOVE GROUND TANK STORAGE
- □ BELOW GROUND TANK STORAGE
- ▒ CONTAINMENT/STAINED AREAS

ENSR

SITE CLOSURE PLAN
GROW GROUP, INC.
2501 MALT AVENUE
CITY OF COMMERCE, CALIFORNIA

DRAWN BY: BM	DATE: 6/1/89	PROJECT NO.: 4770-001
CHK'D BY:	REVISED:	DWG.NO.: DIAGRAM 2

2.4.1 Waste Motor Oil/Water Separator Tank, Oily Water Storage Tank, Steam Cleaning Collection Sump, and Surrounding Containment Area (Location Reference Numbers 1,2,9 and A)

This area generally abuts the southern corner of Building 2B. Vehicle maintenance activities take place inside the building. Waste motor oil and occasionally other oils from company vehicles and fork lifts are collected in a trough and are piped to the waste oil tank outside the building. Radiator and coolant system change-out water was collected in the same system. As the water portion separates from the oil, it is bled off into the oily water tank. The asphalt nearest the building has some oily residue.

In the past, company vehicles were steam cleaned and the runoff washed into a sump. This sump is to be removed along with all other larger sumps at the site (See Attachment A).

2.4.2 Waste Hydraulic Oil/Water Separator Tank (Location Reference Numbers 3 & G)

Waste hydraulic and associated oils are generated from change-outs and occasional leakage from the blow molding machines inside the northwestern area of Building 4B. Cooling water and mop water also enters the same system where the oil/water combination is piped to a sump outside of the building and next to an oil/water separator. As the water separates from the oil it is discharged to a drain for eventual discharge to the sewer. Within 90 days from initial accumulation the oil is transported off site for recycling or disposal.

The oil/water separation system rests on a concrete slab enclosed by a six to eight inch high concrete curb. Blow down water from cooling tower, rainwater and occasional oil/water from the separation tank collects within this containment area, then drains to the sewer system. The pumping and associated piping are located aboveground while the floor sump drain pipes are below ground.

2.4.3 Former Trichloroisocyanuric Acid, Sodium Dichloroisocyanurate, Lithium and Calcium Hypochlorite Neutralization Tank (Location References Number 4)

Solid wastes as listed above were formerly dissolved and neutralized in tank #22 which abuts the southern corner of Building 4C. This process has been discontinued.

2.4.4 Muriatic Acid Storage Tank (Location Reference Number 8 & E)

Weak wash muriatic acid is produced from bottle filling operations. Acid wash is collected by a floor sump in the acid bottle filling room. The room floor is covered with fiber glass for corrosion prevention. Collected acid wash is pumped into an adjacent above ground tank for storage. A secondary containment surrounding the tank consists of a six feet high concrete block wall to all sides and a concrete floor.

2.4.5 Acid/Caustic Storage Tanks and Neutralization Tank (Location Reference Number 5,6,7 and D)

Tanks 23, 24 and 25 are provided with a containment area consisting of a concrete flood slab, a six inch high contiguous concrete curbing to three sides and concrete block building wall to the fourth side. The containment surface area is approximately 450 square feet. Most piping is constructed of PVC and located above ground in the containment area.

Surface liquids are directed to a small subsurface sump in the south corner of the containment area. Surrounding Tank 22 and the containment for Tanks 23, 24 and 25 is a secondary concrete containment slab of an approximate 2000 square feet area. The slab is sloped towards the middle of the structure from the west and east sides. A depression along the center of the slab collects any liquids.

2.4.6 Waste Bleach, Mop Water, Transfer Port Acid/Base Spillage Drains and Sumps (Location Reference Numbers 11, 12 and 13)

These drains and three sumps are located to the east of Building 4C. Waste liquids collect here before being transferred to Tank 23 for neutralization. The concrete sumps are used to collect rainwater, rinse water, caustic, bleach and acid spills from production and maintenance areas.

2.4.7 Container Storage Areas (Location Reference Numbers 14,15,16,17,18,B,C & F)

Two hazardous material/waste container storage areas are presently used while three additional areas were previously used. Empty and full containers of caustic and acid products are stored on pallets abutting the north side of building 2A. This asphalt covered area covers approximately 1,800 square feet and is sloped in a slight grade to the north (away from the building) where it meets a concrete containment surface slab. Liquids from rainfall or spills flow to the concrete slab center (the lowest gradient point).

Dry wastes produced from the trichloroisocyanuric acid tablet pressing operations, and lithium and calcium hypochlorite, sodium bisulfate and cyanuric acid packaging operations, are stored in containers on wooden pallets in Building 3. The building is open to the north and the approximately 1,200 square foot concrete slab floor gently slopes toward the north for drainage to the asphalt parking area.

Waste hydraulic oils were formally stored in 55-gallon containers on wooden pallets south of Buildings 5. The concrete paved surface area is graded south to direct rainwater to the center of the area between Buildings 4B and 5. A six inch high concrete curb is situated between the former drum storage and Building 5. The former drum storage area contains approximately 1000 square feet.

GP identified a former containment area in its Part A application which was located on the south side of Building 4C. According to the application, this area was used to store containerized wastes. The area consists of a concrete floor slab sloped to a sump in the center with a concrete curb (approximately six inches in height) along the perimeter. The area contains approximately 600 square feet and is covered by a steel roof.

Trichloroisocyanuric acid, sodium dichloroisocyanurate, soda ash and small quantities of other material were formerly stored in drums inside Building 5. The containers were removed in 1988 and packaging materials are now stored in the building. The building contains approximately 17,000 square feet of storage area. The building is erected on a flat concrete slab and has a steel roof, three corrugated walls with the remaining side covered by tarps.

2.5 Maximum Waste Inventory

For purpose of this closure plan, the maximum waste volume which can be accumulated onsite at any one time by the previously described waste management and storage tanks (assuming all units were full) is 31,170 gallons of liquid. This volume includes the contents of the tanks and sumps listed in Table 1. It is estimated that ancillary piping/equipment associated with these units can store an additional 600 gallons of liquids. These volume estimates do not account for storage of hazardous wastes in containers. It is anticipated that no greater than ten cubic yards of solid wastes will be stored in containers on-site at any one time.

3.0 CLOSURE PROCEDURES

The closure procedures described herein are designed to identify past or present contamination of equipment, structures and the environment; abate such contamination so as to minimize or eliminate threats to human health and the environment; and prevent the escape of hazardous wastes to the ground, surface waters and atmosphere after closure.

GGI will achieve closure by removing hazardous waste residuals and decontaminating those identified waste management units and areas. Unit or area sampling and analytical testing will follow removal/decontamination procedures to assure that closure activities were effective and successful.

3.1 Closure of Aboveground Tank HMUs

3.1.1 Field Activities

Eight aboveground tanks and equipment will require closure. All of these tanks will, however, continue to operate following closure and will contain essentially the same materials. These HMUs will require only outer surface decontamination. The containment and surrounding areas will also be decontaminated, as well as characterized for potential contamination. During decontamination activities, flow of aqueous materials will be discontinued, valves closed, tank openings sealed and area access restricted.

Decontamination operations will consist of steam cleaning the exterior surfaces of all tanks, pipes, equipment, building and containment area surfaces three times. Steam cleaning is effective for surface decontamination since steam can physically remove and react with contaminants. Additionally, most chemical constituents which are being removed from the site units are relatively soluble in water, and increasingly soluble in heated water. The pressure and temperature gradients can be easily changed to provide greater cleansing capabilities, if it is

identified that initial efforts were insufficient. Absorbent and neutralizing materials, e.g., vermiculite and soda ash, will be readily available in case of spillage, uncontrollable rinse water release or if corrosive conditions exist.

Decontamination will be performed on tanks and equipment by steam cleaning the outer surfaces beginning from the top of each tank and working downward. Upon completion of the tanks, building or foundation walls will be cleaned in the same manner. Residual waters from the process will be collected in the secondary containment area, then pumped into tank #23.

The containment area decontamination activities will proceed by steam cleaning the area which is upgradient to surface flow direction and moving towards the final collection area. A sump pump will be installed in the containment area so that overflowing is prevented. Plastic lining will be placed on surfaces immediately surrounding the units or areas to prevent potential contamination of them. Rinse waters will be pumped directly into Tank 23 (if easily accessible) or into suitable 55-gallon drums prior to transfer to Tank 23.

3.1.2 Sampling and Analytical Methodology

Rinse water samples will be collected from the rinse water holding tank following the third steam cleaning of each unit and area. One representative sample from each unit/area will be placed in a glass jar, sealed, labelled, stored in a secured ice chest and delivered to a State certified laboratory. Analytical tests to be performed on each sample are presented in Table 2. Analytical tests are based upon chemical constituents presently or formerly stored in the unit/area, as indicated in Table 1.

3.2 Closure of Sump HMUs

Five larger sumps are located on site. These sumps are constructed of cement and were designed to collect wastewaters produced from drum cleaning and steam cleaning activities,

TABLE 2
SAMPLING PROTOCOL AND METHODOLOGIES

LOCATION REFERENCE NUMBER (SEE DIAGRAM 2)	SAMPLE TYPE	NUMBER OF SAMPLES	EPA ANALYTICAL METHOD
1 and 2	Rinse Water	1	418.1,8010
A	Soil	2	418.1,8010
3 and G	Rinse Water	1	418.1
G	Soil	2	418.1,8010
4 and D	Rinse Water	1	pH, 330.2 *CAM Bioassay
D	Soil	4	pH, 330.2 *CAM Bioassay
5,6,7	Rinse Water	1	pH, 330.2
8 and E	Rinse Water	1	pH, 330.2 *CAM Bioassay
E	Soil	2	pH, 330.2
9-13	See Attachment A		
14 and B	Soil	2	pH, 330.2,
15	Soil	2	pH, 330.2 & 8010
16 and F	Soil	2	418.1
17 and C	Soil	2	pH and 330.2
18	Soil	4	pH, 330.2, 8010, Reac. & *CAM Bioassary
Background	Soil	1	330.2, pH

Methods

418.1 = petroleum hydrocarbons
8010 = halogenated volatile organic hydrocarbons
330.2 = total chlorine content
CAM BIOASSAY = 96 hour fish toxicity
Reac. = Reactivity
* Dependent upon total chlorine content

production line washwater and rainwater runoff. As approved by the Los Angeles County Department of Public Works, these tanks will be closed in place (See Attachment A). All applicable DPW directives will be followed.

3.3 Closure of Drum Storage/Containment Areas

3.3.1 Field Activities

Soil samples will be collected from the identified storage/containment HMUs. Soil borings will be completed with a stainless steel hand auger after the concrete or asphalt has been cut away. The samples will be collected between three and six feet below grade, depending on the type of soil encountered. The soils are believed to be largely silty sands.

Upon retrieval from the sampler, the soil will be compacted into 250 milliliter sample jars with Teflon® cap liners. The sample jars will be labeled with identifying information, sealed with plastic tape, further sealed in zip-lock plastic bags, and placed on ice in a secure ice chest. All sampling equipment will be thoroughly cleaned and decontaminated before sample collection. Decontamination will consist of a tap water rinse, a thorough scrubbing with tap water and trisodium phosphate (TSP) detergent, a second tap water rinse, and a final rinse with distilled water. Bore holes will be backfilled with the cuttings and packed with a concrete or asphalt patching material.

3.3.2 Sampling and Analytical Methodology

The number of soil samples and analytical tests to be performed on each sample is presented in Table 2. All soil samples will be collected, stored, and transported in accordance with EPA guidelines. The samples will be delivered to a laboratory certified by the State of California Department of Health Services

for hazardous waste analyses. Chain-of-custody procedures will be followed throughout the process.

The following criteria was utilized to select the number of soil sampling points and their distribution in the containment/storage areas.

1) At a minimum two soil sampling points will be selected for each containment/storage area included in the closure activity. If an area is irregularly shaped, e.g. L-shaped, entails an area which is significantly larger than other areas, or had a known spill or incident, the number of samples will be increased.

2) If the subject containment area is graded, the designated number of sample points will be evenly distributed along the lowest plane.

3) If the subject containment area is level the designated number of sample points will be evenly spaced in the containment area.

If potential soil contamination is identified, additional samples will be obtained upon approval by the DHS.

EPA analytical methods appropriate for the suspected contaminants will be utilized on the above samples. The following is a list of the analyses which will be used, as they appear in Table 2, along with a brief discussion explaining the intended purpose of such analyses:

- 418.1 Petroleum Hydrocarbons - This analysis will detect heavy hydrocarbons ranging from C12 to C30 on a cumulative basis. It will assist in characterizing soils which could potentially contain waste oils including hydraulic fluids and motor oils.

- EPA Method 8010 - This analysis will detect Purgeable and halogenated volatile hydrocarbons ranging generally up to C12. This would include chlorinated solvents.

- EPA Method 330.2 - This analysis along with a pH measurment could provide initial information regarding total chlorine content and the surrounding environmental conditions (i.e. basic or acidic).

- CAM BIOASSAY - This analysis (96 hour aquatic toxicity test) measures the toxicity of the subject material as a Lethal Concentration (LC 50). This analysis will be used when a significant total chlorine content is detected. Product material at the subject site such as trichloroisocyanuric acid and sodium dichloroisocyanurate could exhibit toxic characteristics as measured by CAM BIOASSAY.

4.0 HEALTH AND SAFETY PROCEDURES

A site specific health and safety plan will be prepared for all personnel and subcontractors conducting activities at GGI's Commerce facility. If a subcontractor chooses not to utilize GGI'S health and safety plan, the subcontractor must provide a written plan to GGI that must be approved prior to the initiation of field activities.

The plan will be written in accordance with the requirements specified in the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard, Title 29 of the Code of Federal Regulations Section 1910.120. Additional guidance will also be obtained from the document entitled "Site Safety Plan Guidance Document," prepared by the California Department of Health Services. Plan components will include the following areas:

- Description of the work site and objectives of the investigation;
- Expected hazards to personnel and potential concentrations;
- Preliminary hazard assessment;
- Personal protective equipment;
- Onsite ambient and personnel monitoring procedures where necessary and equipment to be used;
- Work site control measures;
- Standard site safety guidelines;
- Personal and equipment decontamination; and
- Emergency response procedures and notification requirements.

5.0 POST CLOSURE

Since there has been no land disposal, land treatment, surface impoundments, or waste piles at GGI's Commerce facility, post closure care is not required.

6.0 SCHEDULING

A schedule of closure activities to be implemented is presented in Table 3. These activities will commence immediately following approval of this closure plan by the State of California, Department of Health Services. Upon completion of closure activities, a certificate of closure completed by a qualified professional engineer, registered in California, will be submitted to the Department.

TABLE 3

CLOSURE SCHEDULE

CLOSURE ACTIVITY	0	30	60	90	120
			(DAYS)		
1) Approval of Closure Plan	X				
2) Begin Closure - Mobilization		XXXXX			
3) Decontamination of tanks and containment area		XXXXX			
4) Soil and rinse water sampling and analysis			XXXXX		
5) Demobilization				XXXXX	
6) Final closure certification and inspection					XXXXX

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

P-B-A-6

STATEMENT OF FACTS IN THE INVESTIGATION OF

Grow Group, Inc.
200 Park Avenue, 49th Floor
New York, NY 10166
dba
Grow Group, Inc.
Consumer Products Division
2425-2501 Malt Avenue
Commerce, CA 90040
(213) 724 6530
CAD085393080
and
Grow Group, Inc.
Consumer Products Division
760 South Vail Avenue
Montebello, CA 90640
(213) 724 6530
CAD009380890

Prepared by: Roy Thielking, P. E.
Associate Waste Management Engineer
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, California 90012
(213) 620 2380

I. SUMMARY:

On June 16, 1988, Roy Thielking and Mary Osborne, employees of the California Department of Health Services (DHS), conducted compliance evaluation inspections at two interim status hazardous waste storage and treatment facilities owned/operated by Grow Group, Inc. (GGI), 200 Park Avenue, New York, NY 10166, and other responsible parties named herein below. The facilities are located at 2425-2501 Malt Avenue, Commerce, CA (Malt Facility), and at 760 South Vail Avenue, Montebello, CA (Vail Facility). They were formerly owned/operated by Georgia-Pacific Corporation (GPC), 133 Peachtree Street, Atlanta, GA 30348-5605.

On November 17, 1980, GPC filed with USEPA, for each of the subject facilities, a Part A hazardous waste permit application which disclosed ownership interests of other persons and/or corporations in the subject facilities. (See Exhibits Nos. 1 thru 5, and Exhibit 7, Attachment A.)

On December 23, 1981, DHS issued an Interim Status Document (ISD) for the Vail Facility only. (See Exhibit No. 6.)

A. Malt Facility:

During the June 16, 1988 inspection at the Malt Facility, the DHS inspectors found six violations of applicable sections of Title 22, California Code of

Regulations (22 Cal. Code Regs.), as follows: (See Exhibit No. 7, Attachments J, K, & L.)

Section 66389 (b) (4) Failure to file a revised Part A permit application (Part A) with DHS at least 90 days prior to the transfer of ownership from GPC to GGI.

Section 67102 (b) Failure to keep at the facility a waste analysis plan.

Section 67105 (d) Failure to keep at the facility job titles, job descriptions, description of training given employees, and records to document training of employees concerned with hazardous waste management.

Section 67142 Failure to maintain at the facility a contingency plan.

Section 66492 (a) Failure to keep at the facility a copy of all manifests for three years.

Section 67212 Failure to prepare, update, and keep at the facility a copy of the closure/post closure plan.

On August 10, 1988, the Malt Facility experienced an emergency involving three polyethylene lined fiber drums out of perhaps 500 drums of trichloroisocyanuric acid and/or sodium dichloroisocyanurate which the facility had stored for up to two years. These materials are listed in 22 Cal. Code Regs., section 66680 as flammable hazardous wastes, and the materials in question have been acknowledged by Marti to have been contaminated and/or packaged in deteriorated containers.

On September 2, 1988, the fire department was called in to the Malt Facility to deal with an emergency involving eight drums of the subject stored hazardous material that GGI had intended to recycle or dispose of. On that occasion, the fire department ordered the evacuation of several thousand people from the nearby residential areas.

On September 3 or 4, 1988, the Malt Facility experienced a further emergency resulting from its attempts to treat its stored reactive wastes. Then the Los Angeles County Department of Health Services (LACDHS) instituted an around the clock watch at the facility, and ordered that all remaining containers of hazardous waste be immediately removed to a permitted treatment or disposal facility. LACDHS continued the watch until September 10, 1988.

On September 12, 1988, a follow-up inspection of the Malt Facility was conducted by Roy Thielking and Rick Jones, employees of DHS. David Chase and Jim Marxen, also employees of DHS, observed. That inspection, besides being a follow-up of the June 16, 1988 inspection, is part of a continuing investigation of GGI by the State and the LACDHS. During that inspection, eight further violations of applicable sections of 22 Cal. Code Regs. were identified as follows: (See Exhibit No. 7.)

Section 67103 Facility did not prevent unknowing entry, or minimize unauthorized entry onto the active portion of the facility.

Section 67257 (c) & (d) Open, continuously fed tanks did not have high level alarms, and were not operated to maintain 2 feet of freeboard.

Section 67243 (a) Containers of hazardous waste were not kept closed except when adding or removing waste.
Section 67246 Containers of reactive and/or ignitable waste had been stored within 50 feet of the property line.
Section 67247 (c) Incompatible wastes in containers were stored without berms, dikes walls, or other protection between them.
Section 66471 Failure to characterize wastes.
Section 67120 Failure to maintain and operate the facility to minimize the possibility of release of hazardous waste or hazardous waste constituents.

Review of the file and correspondence subsequent to the September 12, 1988 inspection has disclosed the following additional violations of 22 Cal. Code Regs.:

Section 67145 (i) Facility did not notify the Department and appropriate state and local authorities that the facility is in compliance before resuming operations.
(j) Facility did not submit to the Department within 15 days the required written reports of the emergency incidents. Said written reports have not yet been received by DHS.

Section 66388 (b) (1) Facility built and operated hazardous waste processes that are not described in the original Part A permit application without notifying the Department prior to construction/operation. DHS has yet to receive a revised Part A containing the required description.

On September 17, 1988, GGI submitted to DHS a request for a variance to allow "on-site neutralization of trichloro-s-triazinetrione and sodium dichloroisocyanurate." (See Exhibit No. 7, Attachment Q.)

I recommend that this variance be denied because the wastes involved exhibit the characteristics of flammability, toxicity, and reactivity as defined in 40 CFR Part 261. These wastes appear to not be included among the wastes for which the State may grant a variance, and the treatment of such wastes involves more than elementary neutralization.

I recommend that a formal enforcement action in the form of a corrective action order and complaint for penalties be prepared and issued to ensure that the parties responsible for the above described conditions take the actions necessary to protect human health and the environment, and to bring the Malt Facility into compliance with applicable statutes and regulations.

B. Vail Facility:

During the June 16, 1988 inspection at the Vail Facility, the DHS inspectors found nine violations of applicable sections of 22 Cal. Code Regs., as follows: (See Exhibits Nos. 8, 9, 10, & 11.)

Section 66471 Failure to characterize wastes.
Section 66482 (a) (5) Failure to enter the proper shipping name of a

waste on a manifest.
Section 67102 Failure to have a waste analysis plan at the facility.
Section 67105 (d) Failure to keep at the facility the job titles, job descriptions, description of training given employees, and records to document training.
Section 66492 (b) Failure to keep at the facility the biennial report.
Section 67212 Failure to prepare, update, and keep at the facility a copy of the closure/post closure plan.
Section 66389 (b) (4) Failure to submit to the Department or Regional Administrator a revised Part A 90 days prior to the change in ownership of the facility.
Section 66492 (a) Failure to keep all manifests at the facility.
Section 67103 (b) Failure to maintain security of the facility.

I recommend that a separate formal enforcement action in the form of a corrective action order and complaint for penalties be prepared and issued for the Vail Facility to ensure that the responsible parties take the actions necessary to protect human health and the environment, and to bring the facilities into compliance with applicable statutes and regulations.

II. SUBJECTS:

A. Business Concerns:

Grow Group, Inc.
A New York corporation
dba Grow Group, Inc., Consumer Products Division
2425-2501 Malt Avenue
Commerce, CA 90040
(213) 724 6530

dba Grow Group, Inc., Consumer Products Division
760 South Vail Avenue
Montebello, CA 90640
(213) 724 6530

Kilsby Tubesupply Co., aka C.A. Roberts Co.
An Illinois corporation — Malt Facility's legal owner
9500 Telstar Avenue
El Monte, CA91731
(213) 443 6141

Goodyear Tire and Rubber Company — Malt Facility's legal owner
An Ohio corporation
1144 East Market Street
Akron, Ohio 33316

Georgia-Pacific Corporation — Former owner/operator, both facilities
A Georgia corporation
Packaging Division
133 Peachtree Street (P.O. Box 105605)
Atlanta, GA 30348-5605

B. Individuals:

Dennis B. Sabadin Grow Group, Inc. Consumer Products Division 760 South Vail Avenue Montebello, CA 90640 (213) 724 6530	Former plant manager, Malt Facility; now plant manager, Vail Facility.
Michael T. Goldstein Consumer Products Division 760 South Vail Avenue Montebello, CA 90640 (213) 724 6530	Formerly director of environmental affairs, GGI.
Kim Marti Grow Group, Inc. Consumer Products Division 2425-2501 Malt Avenue Commerce, CA 90040 (213) 724 6530	Plant manager, Malt Facility
F.G. Marshall 8301 East Florence Avenue Downey, CA 90240	Vail Facility's legal owner
Edward A. Marshall 8553 El Paseo Grande La Jolla, CA 92037	"
Jim Christenson 5045 Alta Canyada Road La Canada, CA 91011	"
Thomas J. Henderson 4465 Outrigger Circle Huntington Beach, CA 92649	" , (not included in 9/9/86 revised NHWA)
Kathlyn B. Marshall 5538 The Toledo Long Beach, CA 90802	" "

III. VIOLATIONS:

The following violations may be prosecuted civilly under California Health and Safety Code (H&S Code) Sections 25189 (b) and (d), and 25189.2 (b) and (c), or criminally under H&S Code Sections 25189.5 (b), 25190, and 25191.

A. Malt Facility. - Counts 1 through 6 were identified during the June 16, 1988 inspection.

Count 1: 22 Cal. Code Regs., section 66389 (b) (4). Failure to file a

revised Part A with the Department at least 90 days prior to transfer of ownership of the facility.

GGI has yet to submit to the Department a revised Part A permit application reflecting the change in ownership, which occurred July 31, 1986. The revised Part A must contain all information specified by 22 Cal. Code Regs., section 66390. This is a continuing violation until DHS receives this required report which describes the past, present, and future hazardous waste activity at this facility.

Witnesses: 1 and 2

Evidence: Exhibit No. 7, Attachments J, K, & L.

Count 2: 22 Cal. Code Regs., section 67102. Failure to develop, follow, and maintain at the facility, a waste analysis plan.

When the inspectors asked to see the waste analysis plan, Kim Marti, the plant manager, stated that there was none available at the facility.

The August 8, 1988 response to the July 28, ROV contained as an attachment a copy of a waste analysis plan, issued 7/29/88. Review of that plan is not completed.

Witnesses: 1 and 2

Evidence: Exhibit No. 7, Attachments J, K, & L.

Count 3: 22 Cal. Code Regs., section 67105 (d). Failure to maintain at the facility a training plan and records documenting both initial training and annual review training for each employee engaged in handling hazardous wastes.

When the inspectors asked to see the training plan and records of initial and annual training, the facility representative stated that all such records were kept at the Santa Fe Springs facility.

GGI's August 8, 1988 response to the Department's July 28, 1988 ROV contained a copy of "Hazardous Communication Information and Training," a program intended to satisfy OSHA standard 1910.1200, but there were no provisions in the documents received to indicate the kind and amount of training in hazardous waste management (both initial and annual review) the employees would receive. The contents of the training plan submitted are being reviewed by the Department, and will be the subject of further written communications and/or meetings with GGI.

Witnesses: 1 and 2

Evidence: Exhibit No. 7, Attachments J, K, & L.

Count 4: 22 Cal. Code Regs., section 67142. Failure to maintain at the facility a contingency plan.

The facility contingency plan was not available during the June 16, 1988 inspection. Marti said that the plan had been revised, and was submitted to Goldstein at the Montebello facility for review.

GGI's August 8, 1988 response to the Department's July 28, 1988 ROV stated that the contingency plan was being revised, and a copy would be available by September 15, 1988.

During the September 12, 1988 inspection, David Chase asked if the contingency plan were there at the facility. Marti stated that it was.

Witnesses: 1 and 2 ; 1, 3, and 4.

Evidence: Exhibit No. 7, Attachments J, K, & L.

Count 5: 22 Cal. Code Regs., section 66492. Recordkeeping requirements for the generator.

The manifest records of wastes transported off site were not available upon request at this facility.

GGI's August 8, 1988 response to the Department's July 28, 1988 ROV stated that the manifest records would be available at the facility by September 15, 1988.

Witnesses: 1 and 2

Evidence: Exhibit No. 7, Attachments J, K, & L.

Count 6: 22 Cal. Code Regs., section 67212. Failure to prepare, update, and maintain at the facility, a copy of the closure/post closure plan.

Marti was unable to produce a copy of the closure plan upon request, and indicated that they didn't have one.

GGI's August 8, 1988 response to the Department's July 28, 1988 ROV stated the closure/post closure plan would be updated and available by September 15, 1988.

Witnesses: 1 and 2

Evidence: Exhibit No. 7, Attachments J, K, & L.

The following violations were identified at the Malt Facility during the September 12, 1988 follow-up inspection and/or by reviewing the file and photographs.

Count 7: 22 Cal. Code Regs., section 67103. Security.

The owner/operator did not prevent the unknowing entry, and minimize the unauthorized entry, of persons or livestock onto the active portion of the facility, in that:

Vehicular access gates along Malt Avenue and/or between the public parking lot and the active portion of the facility were not kept closed or attended during this inspection.

At one point during the walkthrough tour of the facility, Chase, Jones, Marxen, and I, together with Marti and Greene, entered the facility from the rail siding area through an open door served by a ladder. This doorway was not guarded or fitted with an automatic closure or alarm device. (See Photo No. 22, Attachment M.)

The rail car access doors to a rail car parking shed, which shed communicates with the rest of the facility, were poorly fitting, and, although locked, permitted access to the facility.

Witnesses: 1 and 4

Evidence: Exhibit No. 7.

Count 8: 22 Cal. Code Regs., section 67257 (c) and (d). General Operating Requirements for Interim Status Facilities.

Uncovered tanks must be operated to ensure at least 60 centimeters (2 feet) of freeboard...

The oil water separator tank at the north corner of the main building was open, and could be continuously fed, but there was no high level alarm or control device to ensure that the level in the tank stayed at least two feet below the top of the tank. The streaks of residues on the outside of the tank indicated that the tank may have overflowed in the past. (See Photos Nos. 5, 6, 7, & 8, Attachment M.)

The tank at the eastern corner of the main building, although nearly empty at the time of this inspection, appeared as if it had overflowed in the past. Marti acknowledged that it had been used as a hazardous waste storage tank associated with the wastewater treatment tank. When I inspected this facility on June 16, 1988, the freeboard was about a foot and a half. (See Photos Nos. 5, 6, & 7, Attachment N.)

Witnesses: 1, 2, and 4

Evidence: Exhibit No. 7.

Count 9: 22 Cal. Code Regs., section 67243 (a). Management of Containers.

Containers holding hazardous wastes were not kept closed during storage, except when it was necessary to add or remove waste, in that:

An open drum labeled "Waste Only," partly full of oil, a California regulated hazardous waste, stood next to a rack of supply oils. There were no employees within sight of it, and no cover for the drum anywhere around it. (See Photos 9 and 10, Attachment M.)

Two pails containing unidentified white solids stood uncovered in the same area as the uncovered oil drum. (See Photo No. 11, Attachment M.) Marti said he didn't know what was in these pails. The white solids usually handled at this facility are either chlorinator or soda ash, both hazardous wastes.

Approximately 30 open plastic drums of white solids, labeled "Top Chlor," were stacked in the yard next to the south warehouse. (See Photos Nos. 32, 33, 34, and 35, Attachment M.)

Six or more unlabeled drums covered with plastic that had holes in it, contained undefined solids that appeared to have the consistency of grease, but may have been from processes using chlorinator chemicals. Marti said he didn't know what they were.

Witnesses: 1, 3, & 4

Evidence: Exhibit No. 7.

Count 10: 22 Cal. Code Regs., section 67246. Special Requirements for Ignitable or Reactive Waste.

It is required that ignitable or reactive waste be stored at least 50 feet from the property line.

The reactive wastes (trichloroisocyanuric acid and sodium dichloroisocyanurate) that Marti acknowledged had been stored in the north shed, had been stored within 50 feet of the property line. (See Photo No. 1, Attachment M.)

Witnesses: 1, 3, ahd 4

Evidence: Exhibit No. 7.

Count 11: 22 Cal. Code Regs., section 67247 (c). Special Requirements for Incompatible Wastes.

The drums stacked just north of the south warehouse were labeled as containing sulfuric acid (33% or 93%), Top Chlor, sodium thiosulfate 60%, formaldehyde 37%, and other unlabeled

materials/wastes. These incompatible wastes were not separated or protected from one another by any dike, berm, wall, or other device. (See Photos Nos. 32 - 42, Attachment M.)

Witnesses: 1, 3, and 4

Evidence: Exhibit No. 7.

Count 12: 22 Cal. Code Regs., section 66471. Hazardous Waste Determination Requirement for the Generator.

GGI failed to determine if each waste stored in the yard just north of the south warehouse is listed as a hazardous waste in Article 9 or 11 of 22 Cal. Code of Regs. When Jones, Chase and/or I asked Marti what was in each lot of drums, he said each time, he didn't know, and indicated the company would have to sample and analyze each group to find out. (See Photos Nos. 32 - 42, Attachment M.)

When I asked Marti what additives GGI uses in the cooling tower, which was discharging to the yard surface, he said he didn't know. He also didn't know what wastes the oil water separator tank treated, or what kind of oil was in the open drum next to these units. (See Photos Nos. 5, 6, & 7, Attachment M.)

Witnesses: 1 and 4

Evidence: Exhibit No. 7.

Count 13: 22 Cal. Code Regs., section 67120 (a). Design and Operation of Facility.

This facility was not maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, in that:

The former drum storage area in the north shed, noted above as having contained trichloroisocyanuric acid and sodium dichloroisocyanurate, both reactive and flammable wastes, had not been cleaned of residues of those hazardous wastes. There was a layer, up to one half inch or so thick, of glassy or sticky looking solid or nearly solid material on the asphalt floor of the north shed where Marti told us the said wastes had been stored. Although some soda ash powder had been scattered over the area "to neutralize it", it did not appear to be sufficient to complete the job. Marti did not indicate how long it would be before the residue would be removed.

The containment areas around the product storage tanks in the main building were not impervious, as Jones, Chase, and I saw indications that wastes had escaped from them in the past along the back side of the building, where stains and mineral deposits traced the course of past discharges. (See Photos

Nos. 17 - 22, Attachment M.) There were discharges of liquid into the containments inside the building, and the concrete was etched to a depth of up to two inches in some places.

The containment around the sodium hydroxide tanks next to the main building contained pooled liquid, and the outside of the containment wall showed residues from seepage of wastes into the yard.

The drainage sump next to the railroad in the yard south of the main building was allowed overflow into the surrounding yard, where cracks in the pavement allowed percolation of wastes into the ground. (See Photo No. 17, Attachment M.)

Witnesses: 1, 3, 4, and 5.

Evidence: Exhibit No. 7.

Review of the file and correspondence subsequent to the September 12, 1988 inspection has disclosed the following additional violations of 22 Cal. Code Regs.:

Count 14: 22 Cal. Code Regs., Section 67145 (i) Facility did not notify the Department and appropriate state and local authorities that the facility is in compliance before resuming operations.
(j) Facility did not submit to the Department within 15 days the required written report of the emergency incidents.

DHS has not yet received these reports, and this is a continuing violation until GGI submits such reports for each occasion that necessitated implementation of contingency plans.

Count 15: Section 66388 (b) (1) Facility built and operated hazardous waste processes that are not described in the original permit application without notifying the Department prior to construction/operation.

The wastewater treatment tanks in front of the main process/ warehouse building are not mentioned in the Part A, and the facility did not submit top DHS any notification describing the changes prior to installation.

The drum storage area next to the south tank farm is designated by the Part A plot plan as "pallet storage", not as a hazardous waste storage area.

During the September 12, 1988 inspection, Marti stated that one of the tanks in the south tank farm was being used to store waste bleach (a hazardous waste) before it was processed through the wastewater treatment plant. This use of the units in the tank farm is not described in the Part A, and the facility did not notify DHS in writing of this (intended) use prior to implementation.

B. Vail Facility - The following nine violations of Cal. Code Regs. were identified during the June 16, 1988 inspection.

Count 1: 22 Cal. Code Regs., section 66471. Failure to characterize wastes.

Wastes spilled on the floor in the plant or the yard outside had not been characterized. When Osborne and I went out into the yard with Loudmilla Manoukian, chemist for the Vail Facility, we saw a pink liquid waste trickling across the paved yard from a pipe leak to a central drain scupper and sump. Manoukian said the pink liquid we asked about was shampoo, but did not characterize it further. When we asked about other released liquids, she either could not explain, or said they were dilute wastes. When we looked into the secondary containment surrounding the 17 tanks in the tank farm, we saw numerous areas where waste liquids stood within the containment area, and the concrete of the floor was eroded. When we asked Manoukian what the wastes were, she indicated they were dilute wastes, that any leakage from pipes or tanks would be hosed down to the sump and pumped to the treatment tank discharging to the sewer.

In the August 5, 1988 response to the Department's July 18, 1988 ROV, GGI included a report of the analysis of wastes discharged to the sewer, but there was no attempt to explain the nature of the wastes released at various points in the yard.

Witnesses: Witnesses 1 and 2.

Evidence: Exhibits Nos. 8, 9, 10, & 11.

Count 2: 22 Cal. Code Regs., section 66482 (a) (5) and (6). Failure to accurately describe and indicate the quantity of each hazardous waste.

Review of the manifest records during the June 16, 1988 inspection disclosed that wastes transported to RhoChem documented by Manifest #87824877 were described as "Waste Flammable Liquid N.O.S.(D001)", but the information given in space J of the manifest indicates the wastes were F005- "Water & solvents from tank cleaning. Drums contain various amounts of water, mineral spirits, isopropyl alcohol, ethanol, methanol, & 1,1,1-trichloroethane." Also, the waste description in space "a." indicates only one type of waste; the handling codes section indicates two drums were recycled, and 16 were subjected to "Other thermal treatment," which suggests two or more different wastes.

GGI's August 5, 1988 response to The Department's July 18, 1988 ROV stated that the shipping name was determined from evaluation of a composite sample obtained by mixing samples from all of the drums, to be "Waste Flammable Liquid N.O.S." In Section J they "further explained the process which generated the waste, which happens to characterize the waste differently." This response does not acknowledge that the manifest contained an erroneous identification

of the hazardous waste class of some of the wastes, or the fact that with only the information given on the manifest, the TSDF personnel could not have made the correct waste management decisions relative to the subject wastes.

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, & 11.

Count 3: 22 Cal. Code Regs., section 67102. Failure to develop, follow, and maintain at the facility a waste analysis plan.

During the checklist review, Osborne and I asked to see the waste analysis plan. Sabadin checked with Manoukian, and then he stated that there was none.

GGI sent the Department a copy of a waste analysis plan with their August 5, 1988 response to the July 18, 1988 ROV. That waste analysis plan, issued July 29, 1988, is inadequate, in that it did not address the characterization of any hazardous waste generated or released except the discharge to the sewer. A more detailed review of the plan is not completed.

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, & 11.

Count 4: 22 Cal. Code Regs., section 67105 (d). Failure to maintain at the facility a training plan and records of employee training.

During the records review on June 16, 1988, Osborne and I asked to see the training plan, and records of initial and annual review training. Goldstein and/or Sabadin stated that all such records were kept at the Santa Fe Springs facility.

GGI's August 5, 1988 response to the July 18, 1988 ROV contained a copy of "Hazardous Communication Information and Training," a program intended to satisfy OSHA standard 1910.1200, but there were no provisions in the documents received to indicate the kind and amount of training in hazardous waste management (both initial and annual review) the employees would receive. The contents of the training plan submitted are being reviewed by the Department, and further comments will be the subject of further written communications, or meetings, with GGI.

On September 28, 1988, GGI sent DHS a "correct Hazardous Waste Training Plan to be implemented at Montebello." That Plan is inadequate, in that it merely paraphrases the regulations describing the type of information to be included in a training plan. It does not include a specific training plan which could be used as a guide for training of personnel. (See Exhibit No. 12.)

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, 11 & 12.

Count 5: 22 Cal. Code Regs., section 66492 (b). Failure to keep a copy of the biennial report at the facility.

During the June 16, 1988 records review, Osborne and I asked to review the latest biennial report (for 1987). After a search through some of the files in the office at the facility, Goldstein and Sabadin stated that they couldn't find their file copy.

GGI's August 5, 1988 response to the Department's July 18, 1988 ROV stated that the subject report (due March 1, 1988) was in process and a copy would be kept at the facility after about September 15, 1988.

On September 28, 1988, GGI submitted to DHS a copy of the biennial report for 1986, and stated that they had requested from GPC a copy of the report for 1984. (See Exhibit No. 12.)

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, 11 & 15.

Count 6: 22 Cal. Code Regs., section 67212. Failure to prepare, update, and maintain a copy of the closure/post closure plan at the facility.

During the June 16, 1988 records review, Osborne and I asked if the facility had a closure/post closure plan. Sabadin and Manoukian were unable to produce a copy of a closure plan, and indicated that they didn't have one.

GGI's August 5, 1988 response to the Department's July 18, 1988 ROV stated that they were working on preparing a closure/post closure plan and would mail it as soon as it is ready. They did not indicate an expected date for completion, however.

On September 28, 1988, GGI sent DHS a further response stating that GGI considers the Vail Facility to be and to always have been a generator only, and therefore asserts that the stated section is inapplicable. (See Exhibit No. 12.)

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, 11 & 12.

Count 7: 22 Cal. Code Regs., section 66389 (b) (4). Failure to submit a revised Part A to the Department at least 90 days prior to transfer of ownership of the facility.

The Department has yet to receive from GGI a revised Part A application reflecting the change in ownership (which occurred July 31, 1986) and describing the past, present, and future hazardous waste activity at the facility as required by 40 CFR 262.

GGI's August 5, 1988 response to the Department's July 18, 1988 ROV included attachments of the following:

12/26/85 letter from GPC to USEPA requesting withdrawal of their Part A application.

1/21/87 letter to DHS requesting clarification of financial responsibility status and asserting the understanding that, since this facility (and the facility at 2501 Malt Avenue, Commerce, CA) had been transferred from GPC to GGI, that GPC would have no further responsibility for compliance with regulations regarding financial responsibility for the subject locations.

1/21/87 letter from GPC to GGI notifying them of GPC's "understanding that it is now the responsibility of Grow Group, Inc. to make all financial reporting requirements to the state."

This is a continuing violation until the required Part A containing all the information required by 22 Cal. Code Regs., section 66390 is received by DHS.

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, & 11.

Count 8: 22 Cal. Code Regs., section 66492(a). Failure to maintain manifest records for at least three years.

Manifests, including, but not limited to, #84756571, documenting the disposition of contaminated soils removed from the facility by Georgia-Pacific Corp., on or about March 31, 1987, were not available for review. During the June 16, 1988 inspection and discussion with management, Osborne and I asked Sabadin and Manoukian if the facility had copies of the manifests and other operating records that documented the removal from the facility of contaminated soil related to the closure of certain underground tanks by GPC and/or its agents. They indicated they did not have a copy of those records.

The August 5, 1988 response contained copies of manifests and GGI's assurance that they had received copies from GPC, but they did not indicate that other operating documents covering the operation would be obtained and retained.

Witnesses: 1 and 2

Evidence: Exhibit Nos. 8, 10, & 11.

Count 9: 22 Cal. Code Regs., section 67103(b). Failure to maintain security of the facility.

The main vehicular access gate into the yard was open and unattended throughout this inspection, allowing public access to the hazardous waste drum storage area and the tank farm. This was brought to the attention of the facility representatives, but the gate remained open and unattended.

GGI's August 5, 1988 response to the ROV stated that the subject gate would, in the future, be kept locked except for authorized entries

Witnesses: 1 and 2

Evidence: Exhibits Nos. 8, 10, & 11.

IV. DESCRIPTION OF FACILITY/WASTE STREAMS

A. Malt Facility.

This facility is located at 2425-2501 Malt Avenue, in an industrial area in the City of Commerce, California. Malt Avenue runs approximately northeast-southwest. The premises consist of two rectangles, one approximately 750 feet by 500 feet oriented along the northwest side of Malt Avenue, and an adjacent property about 200 feet by 350 feet, oriented northwest-southeast.

The paved yard area of the smaller property is normally used only for storage of boxes and other supplies. There is a three sided corrugated iron shed, approximately 100 feet by 200 feet and about 20 feet high, on the northwest side of the property, where LACDHS inspectors found solid chlorinator wastes stored, when they responded to emergency calls on August 10, 1988 and September 2 and 3, 1988.

Osborne and I had the impression during the June 16, 1988 inspection that the premises did not include the smaller rectangle.

The active portion of the facility is either inside the buildings on the larger rectangle, or surrounded with a six foot cyclone fence. There are several large storage/processing tanks within a couple of containment structures inside the main warehouse building, and a bottling line for bleach or other liquids, also within the building. This facility is engaged in the manufacture and/or packaging of swimming pool chlorination chemicals, both liquid and solid. They also package liquid bleach for the retail market, and mineral acids for pH control of swimming pools or industrial processes.

Waste streams include the decanted products from damaged or imperfect containers, and over age bleach products. Empty containers are transported to a landfill. Spilled or off-spec water soluble products are collected in an aboveground tank and after pH adjustment, are discharged to the sewer.

There is some used hydraulic oil that is stored in drums and periodically sent to a recycling facility.

B. Vail Facility.

This facility is located within an industrial area of Montebello, California. The active portion of the facility is surrounded with a six foot cyclone fence. There are several large liquid storage tanks along the east side of the yard, within a concrete block wall about three feet high. There are five mixing or storage tanks along the south side of the yard, and two propane storage tanks near the northwest corner of the yard. Inside the building, there is one package (bottle) filling line. This facility is primarily a packager of various household products such as hair spray, shampoo, dish liquid, etc. Some products are packaged in spray cans, using propane as the propellant.

Waste streams at the Vail Facility include the decanted products from damaged or imperfect containers and the contaminated crushed containers. The crushed containers are manifested and transported to a Class I landfill. The former contents are either returned to the production process or are stored in drums for later shipment to a recycling facility. Spilled or off-spec water soluble products are collected in an aboveground tank, and after pH adjustment, are discharged to the sewer.

V. DETAILS:

A. Malt Facility

The GGI facility at 2501 Malt Avenue, Commerce, CA (Malt Facility) is an interim status storage and treatment facility for which an Interim Status Document has not been issued. It manufactures and/or packages liquid and/or solid water chlorination and pH adjustment chemicals, liquid bleach for the retail trade, and industrial strength cleaning products for janitorial firms. It stores and treats hazardous wastes that it generates, and recycles over age products.

Since February 20, 1986, the Malt Facility, then owned by GPC, has been the subject of an investigation by LACDHS because of a release of chlorine gas into the nearby neighborhood. On February 22, 1986, LACDHS gave orders to GPC to remove or neutralize several hundred drums of hazardous wastes. (See Exhibit No. 7, Attachment E.)

On July 31, 1986, GPC notified USEPA of a transfer of ownership of both the Vail Facility and the Malt Facility to GGI. (See Exhibit No. 7, Attachment H.)

On September 9, 1986, GGI filed with USEPA a Notification of Hazardous Waste Activity for each of the two subject facilities, asserting that each facility is only a generator of hazardous waste. (See Exhibit No. 7, Attachment P, and Exhibit No. 12.)

On June 16, 1988, DHS conducted a compliance evaluation inspection at the Malt Facility, and found six violations of 22 Cal. Code Regs., as enumerated in the Summary section above. (See Exhibit No. 7, Attachment J.)

On July 28, 1988 DHS sent GGI a Report of Violation and Schedule of Compliance (ROV), related to the June 16, 1988 findings at the Malt Facility. (See Exhibit No. 7, Attachment K.)

On August 8, 1988, GGI replied to the July 28, 1988 ROV related to the Malt Facility. (See Exhibit No. 7, Attachment L.)

On August 10, 1988, the Malt Facility experienced an emergency involving three polyethylene lined fiber drums out of perhaps 500 drums of trichloroisocyanuric acid and/or sodium dichloroisocyanurate which the facility had stored for up to two years. These materials are listed in 22 Cal. Code Regs., section 66680 as flammable hazardous wastes, and Marti has acknowledged the materials in question were contaminated and/or packaged in deteriorated containers, some of which were labeled as hazardous waste. He also has stated that GGI intended to recycle, or neutralize and dispose of, these wastes.

On September 2, 1988, The fire department was called in to the Malt Facility to deal with an emergency involving eight drums of stored hazardous material that GGI had intended to recycle or dispose of. On that occasion, the fire department ordered the evacuation of several thousand people from the nearby residential areas.

On September 3 or 4, 1988, the Malt Facility experienced a further emergency resulting from its attempts to treat its stored reactive wastes. Thereupon LACDHS instituted an around the clock watch at the facility and ordered that all remaining containers of hazardous waste be immediately removed to a permitted treatment or disposal facility. LACDHS continued the watch until September 10, 1988.

On September 12, 1988, I and Rick Jones of DHS conducted a reinspection of the Malt Facility. David Chase and Jim Marxen, also of DHS, observed. That inspection, besides being a follow-up of the June 16, 1988 inspection, is part of a continuing investigation of GGI by the State and the LACDHS. During that inspection, further violations of applicable sections of 22 Cal. Code Regs. were identified as follows (See Exhibit No. 7.):

Section 67103 Facility did not prevent unknowing entry, or minimize unauthorized entry onto the active portion of the facility.

Section 67257 (c) & (d) Open, continuously fed tanks did not have high level alarms, and were not operated to maintain 2 feet of freeboard.

Section 67243 (a) Containers of hazardous waste were not kept closed except when adding or removing waste.

Section 67246 Containers of reactive and/or ignitable waste were stored within 50 feet of the property line.

Section 67247 (c) Incompatible wastes in containers were stored without berms, dikes walls, or other protection between them.

Section 66471 Failure to characterize wastes.
Section 67120 Failure to maintain and operate the facility to minimize the possibility of release of hazardous waste or hazardous waste constituents.

Review of the file and correspondence subsequent to the September 12, 1988 inspection has disclosed the following additional violations of 22 Cal. Code Regs.:

Section 67145 (i) Facility did not notify the Department and appropriate state and local authorities that the facility is in compliance before resuming operations.
(j) Facility did not submit to the Department within 15 days the required written report of the emergency incidents. Said written reports have yet to be received by DHS.

Section 66388 (b) (1) Facility built and operated hazardous waste processes that are not described in the original permit application without notifying the Department prior to construction/operation.

On September 17, 1988, GGI submitted to DHS a request for a variance to allow "on-site neutralization of trichloro-s-triazinetrione and sodium dichloroisocyanurate." (These constituents are listed in 22 Cal. Code Regs., section 66680 as flammable, and trichloro-s-triazinetrione (listed as trichloroisocyanuric acid) is also described as toxic and an irritant. Other references, including Monsanto Chemical Co.'s MSDS, describe reactive properties of these materials.) (See Exhibit No. 7, Attachment Q.)

On September 23, 1988, GGI submitted a further response to DHS' July 28, 1988 ROV for the Malt Facility. That letter states that the information on their August 18, 1986 NHWA is no longer current, and requests forms for filing an amended Notice. Said letter also states that GGI' Malt Facility was not, and is not, a TSD, and that closure/post closure requirements are inapplicable. (See Exhibit No. 7, Attachment P.)

I recommend that this variance be denied because the wastes involved exhibit the characteristics of flammability, toxicity, and reactivity as defined in 40 CFR Part 261. These wastes appear to not be included among the wastes for which the State may grant a variance, and the treatment of such wastes involves more than elementary neutralization.

On October 14, 1988, the November 17, 1980 Part A was referred to Gautam Guha of DHS' Facilities Permitting Unit for evaluation. Pursuant to 22 Cal. Code Regs., section 66389 (a) (2), should DHS determine that the Part A permit application is deficient and that the owner/operator is not entitled to interim status, DHS may so notify the owner/operator. The owner/operator would then be subject to enforcement actions for operating without a permit.

I recommend that a formal enforcement action in the form of a corrective action order and complaint for penalties be prepared and issued for the Malt Facility to ensure that the parties responsible for the above described

conditions take the actions necessary to protect human health and the environment, and to bring the Malt Facility into compliance with applicable statutes and regulations.

B. Vail Facility

On June 16, 1988, DHS conducted a compliance evaluation inspection at the Vail Facility and found nine violations of 22 Cal. Code Regs., as enumerated in the Summary above. (See Exhibit No. 8.)

On July 18, 1988, DHS sent GGI a Report of Violation and Schedule of Compliance (ROV), related to the June 16, 1988 findings at the Vail Facility. (See Exhibit No. 10.)

On August 5, 1988, GGI replied to the July 18, 1988 ROV related to the Vail Facility. (See Exhibit No. 11.)

On September 28, 1988, GGI submitted a further response to DHS' July 18, 1988 ROV for the Vail Facility. (See Exhibit No. 12.) That response contained:

> A "correct Hazardous Waste Training Plan" which is merely a paraphrase of the requirements for such plan.
>
> A copy of the biennial report for 1986. That report does not claim any nonregulated status exclusion, and notes a "waste pile" of "93 C", and "Hazardous waste, solid, N.O.S. ORM-E NA 9189 of 93 C.

The Vail Facility is not in compliance with the applicable regulations, as enumerated above. The responses from GGI so far received by DHS have been inadequate.

I recommend that a separate formal enforcement action in the form of a corrective action order and complaint for penalties be prepared and issued for the Vail Facility to ensure that the responsible parties take the actions necessary to protect human health and the environment, and to bring the facility into compliance with applicable statutes and regulations.

VI. EVIDENCE:

Exhibit List

1. GGI Corporate Documents
2. GPC Corporate Documents
3. Kilsby Tubesupply Co. Corporate Documents
4. Goodyear Tire and Rubber Company Corporate Documents
5. Copy of GPC's November 17, 1980 Part A, Vail Facility
6. Copy of Interim Status Document, Vail Facility

7. Copy of September 12, 1988 inspection report, Malt Facility, including attachments and photos taken June 16, 1988, as well as September 12, 1988

8. Copy of DHS June 16, 1988 Inspection Report, Vail Facility (Narrative only)

9. Copy of photos taken June 16, 1988, Vail Facility (which were not finished when the original report was submitted)

10. Copy of July 18, 1988 ROV, Vail Facility

11. Copy of August 5, 1988 response, Vail Facility

12. Copy of GGI's September 28, 1988 response to ROV, Vail Facility

VII. WITNESSES:

1. Roy Thielking
Associate Waste Management Engineer
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012
(213) 620-2380

Will testify to statements and events from the inspections on June 16, 1988 and September 12, 1988.

2. Mary Osborne
Associate Hazardous Materials Specialist
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

Will testify to statements and events from the inspection on June 16, 1988.

3. David M. Chase
Program Supervisor
Surveillance and Enforcement Unit
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

Will testify to statements and events from the inspection on September 12, 1988.

4. Rick Jones

Hazardous Materials Specialist
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

Will testify to statements and events from the inspection on September 12, 1988.

5. Jim Marxen
Public Information Officer
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

Will testify to statements and events from the inspection on September 12, 1988.

Gautam Guha
Senior Hazardous Waste Management Engineer
Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

Will testify to the regulatory status of the subject facilities.

Prepared by:

Roy Thielking 10/18/88

Roy Thielking
Associate Waste Management Engineer
Department of Health Services
Toxic Substances Control Division
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107 South Broadway, Room 7011
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Reviewed by:

David M. Chase

David M. Chase
Program Supervisor
Surveillance and Enforcement Unit

Department of Health Services
Toxic Substances Control Division
Region 3 (Los Angeles)
107 South Broadway, Room 7011
Los Angeles, CA 90012

D

CHRONOLOGY OF EVENTS
for
Grow Group, Inc.
Consumer Products Division
2501 Malt Avenue
Commerce, CA 90040
CAD085393080

3/15/71 Operations began at this facility, according to the Part A filed with USEPA, on 11/17/80.

11/17/80 Georgia-Pacific Corporation (GPC) filed a Part A hazardous waste facility permit application with USEPA.

Hazardous waste streams identified by the Part A included:

U226 1,1,1-Trichloroethane	Storage, containers
U002 Acetone	"
F001 Spent chlorinated solvents	"
D001 Ignitable wastes	"
D002 Corrosive wastes	Treatment, tanks
D003 Reactive wastes	Storage, containers

Hazardous waste management units depicted in the drawings included with the Part A are:

"Area I - 16' diam. storage tank H.W." - This appears, from comparison of a photograph submitted with the part A with photographs nos. 5 & 6 taken on September 12, 1988, to be a tank about nine feet in diameter, located north of the main building.

"Area II" - A 20' by 40' area marked "Drum storage area H.W.", on the south side of the main building.

"pH Control System I" - Part A drawings show what appears to be a three stage clarifier which was connected to drains from two "acid" drain sumps and a mix tank. Downstream of the first clarifier, area drains shown entering the sewer line include one unlabeled, one from a "tank farm", one "Bleach 14%", and two "Bleach 6%".

"pH Controller System II" - Part A drawings show apparent three stage clarifier accepting drainage from "Bulk Filling" area and from a yard drain serving the area just south of "Area II".

"Treatment Tank No. 1" - "7' by 10'" tank, possibly a four stage clarifier, is shown intercepting all of the above drainage, and a "pH Recorder only" is shown just prior to the exit from this tank.

Two more unlabeled drains, apparently from within the main building and possibly draining hazardous materials (dry chlorine) storage areas, are shown connected to this sewer main downstream of any monitoring device.

5/21/84 DHS CEI inspection identified the following violations of CFR 40, and a field Report of Violations was issued (Berman):

265.73	(Failure to) Maintain records at the facility on storage of hazardous waste.
265.16d	(Failure to) Update personnel training records and training program to include all requirements of CFR 40.
265.51	(Failure to) Update contingency plan.
265.173	(Failure to) Properly close and label all hazardous waste containers and store in a hazardous waste site.

6/5/84 GPC's reply (Cassandra Biron) to DHS' field ROV stated that:

265.73	Hazardous waste inventory log has been implemented.
265.173	All hazardous waste has been identified and labeled. An area deemed appropriate for hazardous waste storage is being prepared and marked as such.

* The location and extent of the subject area was not described in any documents in the file.

265.16d Request 30 days extension to develop comprehensive training plans and records, with input necessary from corporate staff. GPC is working on Sections 265.16 and 265.51 in conjunction with Montebello O.P.

* No followup documents have been found in the file.

6/7/84 Memo of call (Megan Robinson, Cassandra Biron) states that an automatic system for treatment of "off spec. material" to go on line upon approval of County Eng. and Sanitation Dept. Treatment above ground and monitored before discharge to the County system. Off spec. material can be sold to companies as raw material.

Robinson requested outline of activities to take place for automatic system.

Robinson also stated that a variance could be awarded when the system was near completion.

* There is no indication in the file that the requested outline was ever received by the Department. There are no drawings or other descriptions in the file related to Biron's letter or the matters reported in Robinson's memo.

7/29/85 GPC (Michael T. Goldstein) letter to USEPA requesting reclassification from "TSD Interim Status" to generator only, claiming that their treatment unit is elementary neutralization only, and totally enclosed.

8/16/85 USEPA replied to Goldstein that DHS had interim authorization, and any change in the facility status would have to be issued by DHS.

2/20/86 Fire occurred at the facility, apparently caused by water seeping into drums of stored trichloro-s-triazinetrione.

2/22/86 Los Angeles County Department of Health Services (LACDHS) gave orders to GPC to remove or neutralize several hundred drums of hazardous wastes.

7/31/86 GPC notified USEPA of a transfer of ownership of the facility to GGI.

7/31/86 GPC and GGI executed an Agreement by which GPC sold/leased the Commerce facility to GGI. In part of that Agreement, GPC acknowledged responsibility for:

> "those certain accidental releases of chlorine gas fumes (which are known to have occurred on February 20 and 21, 1986, but which may have occurred at other times) at the City of Commerce, California facility;"
>
> "the leak in a pipe connected to an 8,000 gallon underground diesel fuel tank at the City of Commerce, California facility;" and
>
> "the suspected leak of a 2,000 gallon underground gasoline tank at the City of Commerce facility."

* The file does not contain any records or indication that the above described environmental hazards or suspected hazards were appropriately addressed.

* Section 16 of the above Agreement specifies the conditions under which GGI would lease the real property at the facility from GPC, which GPC holds in fee simple. This would appear to make GPC a continuing Responsible Party to the operation of the facility under the control of GGI.

9/9/86 GGI filed with USEPA a Notification of Hazardous Waste Activity form 8700-12 stating that this facility is only a generator of hazardous waste.

6/16/88 DHS conducted a compliance evaluation inspection (CEI) at the facility. Violations found were discussed with Kim Marti, plant manager.

7/28/88 DHS sent GGI a Report of Violation and Schedule of Compliance (ROV), citing the following six violations of Title 22, California Code of Regulations (Title 22, Cal. Code Regs., related to the 6/16/88 inspection.

Section 66389 (b) (4) Failure to file a revised Part A permit application (Part A) with DHS at least 90 days prior to the transfer of ownership from GPC to GGI.

* 8/8/88 GGI estimated documents would be available on site 9/15/88.

Section 67102 Failure to keep at the facility a waste analysis plan.

* 8/8/88 GGI sent a W.A.P. that contains only general directions for sampling of drums, and of wastewater to the sewer. Methods of analysis, sample preservation and custody, etc., were not addressed, and containerized wastes to be determined were not identified.

11/15/88 2nd ROV with comments on W.A.P.

Section 67105 (d) Failure to keep at the facility job titles, job descriptions, description of training given employees, and records to document training of employees concerned with hazardous waste management.

* 7/28/88 ROV, Count 3.

8/8/88 The training plan submitted is not specific, and does not appear to be adequate for actual use as a training guide. The actual training records at the facility were not checked during the 9/12/88 inspection.

11/15/88 2nd ROV commenting on deficiencies.

Section 67142 Failure to maintain at the facility a contingency plan.

* 8/8/88 GGI letter stated revised C.P. would be available by 9/15/88.

Section 66492 (a) Failure to keep at the facility a copy of all manifests for three years.

* 8/8/88 GGI stated in a letter that the manifests would be returned on site by 9/15/88.

Section 67212 Failure to prepare, update, and keep at the facility a copy of the closure/post closure plan.

* 8/8/88 GGI stated that C/P.C. plan was in process; updated plan would be available by 9/15/88.

8/8/88 GGI replied to the 7/28/88 ROV (see above).

8/10/88 The facility experienced an emergency involving three polyethylene lined fiber drums out of perhaps 500 drums of trichloroisocyanuric acid and/or sodium dichloroisocyanurate which the facility had stored for up to two years. These materials are listed in 22 Cal.

Code Regs., Section 66680 as flammable hazardous wastes, and the materials in question have been acknowledged by Marti to have been contaminated and/or packaged in deteriorated containers.

9/3/88 The fire department was called in to the facility to deal with an emergency involving eight drums of the subject stored hazardous material that GGI had intended to recycle or dispose of. On that occasion, the fire department ordered the evacuation of several thousand people from the nearby residential areas.

9/4/88 The facility experienced a further emergency resulting from attempts to treat its stored reactive wastes. Then the Los Angeles County Department of Health Services (LACDHS) instituted an around the clock watch at the facility, and ordered that all remaining containers of hazardous waste be immediately removed to a permitted treatment or disposal facility. LACDHS continued the watch until September 10, 1988.

9/12/88 DHS conducted a follow up inspection and found the following continuing/additional violations:

Section 67103 Facility did not prevent unknowing entry, or minimize unauthorized entry onto the active portion of the facility.

* DHS elected not to pursue this violation for lack of sufficient documentation for formal enforcement action

Section 67257 (c) & (d) Open, continuously fed tanks did not have high level alarms, and were not operated to maintain 2 feet of freeboard.

* Cited as Count 2, 11/15/88/ROV. No response received from GGI.

Section 67243 (a) Containers of hazardous waste were not kept closed except when adding or removing waste.

* 11/15/88 ROV, Count 6.
12/14/88 reply states that subject wastes were disposed of offsite, and types, quantities stated on the manifests, copies attached to the reply.

Section 67246 Containers of reactive and/or ignitable waste had been stored within 50 feet of the property line.

* 11/15/88 ROV, Count 7.
12/14/88 reply states GGI had engaged ENSR to prepare recommendations for sampling and analysis of the subject area.

Section 67247 (c) Incompatible wastes in containers were stored with no berms, dikes, walls, or other protection between them.

* 11/15/88 ROV, Count 8.
12/14/88 reply does not specifically address this count, but response to Count 5 may include these wastes.
To be confirmed by reinspection.

Section 66471 Failure to characterize wastes.

* 11/15/88 ROV, Count 5.
GGI did not reply to request to characterize cooling tower wastes and oil water separator wastes.

Section 67120 Failure to maintain and operate the facility to minimize the possibility of release of hazardous waste or hazardous waste constituents.

* 11/15/88 ROV, Count 1.

Review of the file and correspondence subsequent to the September 12, 1988 inspection has disclosed the following additional violations of 22 Cal. Code Regs.:

Section 67145 (i) Facility did not notify the Department and appropriate state and local authorities that the facility is in compliance before resuming operations.
(j) Facility did not submit to the Department within 15 days the required written reports of the emergency incidents.

Section 66388 (b) (1) Facility built and operated hazardous waste processes that are not described in the original Part A permit application without notifying the Department prior to construction/operation. DHS has yet to receive a revised Part A containing the required description.

9/17/88 GGI submitted to DHS a request for a variance to allow "on-site neutralization of trichloro-s-triazinetrione and sodium dichloroisocyanurate."

The variance was denied because the wastes involved exhibit the characteristics of flammability, toxicity, and reactivity as defined in 40 CFR Part 261. These wastes appear to not be included among the wastes for which the State may grant a variance, and the treatment of such wastes involves more than elementary neutralization.

9/23/88 GGI submitted a further response to DHS' July 28, 1988 ROV for the facility. That letter states that the information on their 8/18/86 NHWA is no longer current, and requests forms for filing an amended Notice. Said letter also states that the facility was not, and is not, a TSD, and that closure/post closure requirements are inapplicable.

10/14/88 The 11/17/80 Part A was referred to Gautam Guha of DHS' Facilities

Permitting Unit for evaluation. Pursuant to 22 Cal. Code Regs., Section 66389 (a) (2), should DHS determine that the Part A permit application is deficient and that the owner/operator is not entitled to interim status, DHS may so notify the owner/operator. The owner/operator would then be subject to enforcement actions for operating without a permit.

11/15/88 ROV related to 9/12/88 inspection, cited the following eight violations of Title 22, Cal. Code Regs.:

1. 67120 (a). Failure to maintain and operate the facility to prevent/minimize releases.

   Emergencies occurred 8/10/88, and 9/3,4/88 due to uncontrolled reactions in stored hazardous wastes.

   * The containers of waste had been removed by 9/12/88.

   Residues of what may have been hazardous waste remained on the ground in the subject area on 9/12/88.

   * 1/13/89 meeting with GGI - The consultant said he would prepare a written plan for removal and confirmation of removal of the wastes.

Nonimpervious secondary containments and leakage of hazardous wastes from same along back wall of main building 9/12/88.

* No response received.

11/28/88 GGI letter requesting time extension, and stating that GGI is planning to hire an outside consultant to implement the corrective actions maned by the agreenent

11/30/88 GGI letter responding to ROV for the 9/12/88 inspection, and included reports of the 9/3,4/88 incidents.

12/21/88 GPC sent DHS a copy of the 7/31/86 Agreement between GPC and GGI transferring ownership of the facility from GPC to GGI. The document received included an 80 page Agreement and "Schedule 5", a listing of the permits applicable to the facility issued by SCAQMD and CSDLAC.

DHS still needs to obtain the following documents which the Agreement refers to:

Exhibit E	Commerce Lease
Exhibit G	Chlorine and Caustic Agreement
Copies of the permits	listed in Schedule 5
Schedule 6	City of Commerce Assets
Schedule 15	Certain Actions Taken since March 29, 1986
Schedule 19	Litigation and claims

1/13/89 Meeting between GGI and DHS, with GGI's consultant, ENSR. DHS reps. stated that GGI must comply with directives in the ROVs of 7/28/88, 11/15/88, and 12/2/88.

2/2/89 Los Angeles County fire department sent, per DHS' request, copies of their incident reports from the August 10, 1988 and 9/3,4/88 emergencies.

2/2/89 Enforcement meeting, DHS.

2/2/89 GGI's "notification to begin closure of its City of Commerce facility pursuant to the applicable provisions of Article 23, Chapter 30, Division 4 of Title 22, of the California Administrative Code of Regulations."

GGI also states that the facility will continue to operate under generator-only status. It also states "It is our understanding that DHS will not require the facilityto follow interim status or hazardous waste facility permitting or operating requirements."

2/9/88 Telecon between Roy Thielking, DHS, and Terry Burt, Phelan, Marrin, Johnson, and Burgess, attorneys for GPC. Burt asked to review the file on GGI. Thielking told him to call Antoinette Cordero of the A.G.'s office.

Thielking asked for a listing of the materials GPC had sold to GGI when the property was transferred, and also asked if GPC would submit more complete drawings, etc. than were contained in the Part A. Burt said he would see if GPC would send the requested information.

Company:
Georgia-Pacific
2501 Malt Ave.
City of Commerce

Inspector:
C.Berman

I inspected the Georgia-Pacific facility at the above address on 2/25/86.

This plant produces swimming pool care products, plastic bottles, and packages anti-freeze products.

The swimming pool chemicals include both dry and liquid chlorinators. The dry materials contain calcium hypochlorite, sodium dichloro-S-triazinetrione, or trichloro-S-triazinetrione. These chemicals are purchased in bulk, and repackaged by Georgia-Pacific. During the packaging process material is sometimes spilled, and a baghouse system is also used to capture dust. The spilled material is swept up and stored in fiber drums, as is the baghouse dust. Dry materials returned from dealers are also transferred to fiber drums. All these items have been stored in the same area as new raw materials.

Georgia-Pacific also manufactures and packages liquid chlorinators at this plant. These are produced by mixing chlorine gas with water.

The dry materials which have been stored in the fiber drums are recycled into liquid chlorinator by adding them to water, neutralizing the solution with sodium sulfite, and using the chlorine recovered to produce liquid chlorinator.

The company contends that the materials are exempt from the hazardous waste regulations because they are recycled and used where they are generated.

Because of laxness in timely working off of these materials, over 130 drums accumulated. One of the drums ruptured, spilling material on the ground. This was swept up and placed in a fiber drum. The chemicals are reactive, particularly when organic matter such as leaves are mixed with them so heat was generated, which caused the drum to ignite, and chlorine gas was emitted. This occured about

9:00 P.M. on 2/20/86. The fire department was called and the drum was placed in water-filled dumpster, stopping the emission of chlorine. The inspector from the L.A.County Health Dept., Bill Jones, responded to the situation, and on observing the large quantities of material present ordered the company to begin reducing the amount by putting it into the production system.

The company instituted an around the clock program to recycle these materials. At 11:00 P.M. 2/21/86 there was an explosion in the reaction tank, because the batch was being transferred before the reaction was complete. Again, chlorine gas was released to the atmosphere. At 4:00 A.M. 2/22/86 an excess of material was added to the reaction tank. This time a gate valve blew and 6000 gallons of the solution was was released onto a paved area. This material was pumped back into the tank.

gate valve blew 6,000 gallons of water paved

When Bill Jones became aware of these incidents he ordered the process shut down and the excess material removed from the premises. 100 drums of material was taken to the Crosby & Overton storage yard and remains there at this time.

I asked Bob McCormick of ATPD if the process used by GP is recycling and whether these materials are exempt from regulation as hazardous waste. He thought they were, citing the Health and Safety Code, sec. 25143.2(b)(1).

The company generates waste hydraulic oil which is accumulated in a tank and picked up by a waste oil hauler for recyling off premises. They have a waste water treatment system which is monitored by the L.A.County Sanitation District.

Examination of company records revealed that there was no contingency plan at the facility. Michael Goldstein stated that there had been a problem in preparing a contingency plan acceptable to company management but this was now in the final stages of completion.

Georgia-Pacific Corporation
760 South Vail Avenue
Montebello, California 90640
Telephone (213) 724-6530

Attachment F

February 22, 1986

Mr. William Jones
Los Angeles County
Department of Health Services
Hazardous Waste Control Program
2615 S. Grand Avenue, Room 607
Los Angeles,CA 90007

Dear Mr. Jones,

Georgia-Pacific Corporation proposes to mitigate the hypochlorite situation in the following manner:

To stabilize the 65% Calcium Hypochlorite Solid in 32 drums, we propose the following:

1. Lay 2 layers of 4 mil plastic down on the concrete.
2. Place 1 drum of Calcium Hypochlorite on the plastic and 1 empty drum.
3. LIne the empty drum with 1 - 4 mil plastic barrel liner.
4. Mix diatomaceous earth on a 1 to 1 basis with the hypochlorite and place in the clean drum.
5. Continue this procedure until all 32 drums are re-packaged.
6. Restore the hypochlorite in the proper shed with appropriate labeling.

We further propose to neutralize the Calcium Hypochlorite in the following manner:

1. Mix 1 drum of Calcium Hypochlorite, 350 lbs., slowly by bucket or drum cradle with safety chain into large reaction vessel containing 4000 gallons of water.
2. After solution is complete, we will end up with a solution concentrate of .2% available chlorine.
3. Neutralize this batch with Sodium Sulfite Na_2SO_3, which will essentially produce the following reaction:
   $$Na_2SO_3 + Cl_2 + H_2O \rightarrow Na_2SO_4 + 2\ HCl$$
4. Adjust the pH before discharging to the sewer using Sulfuric Acid to bring pH down if necessary.

The following Stoichiometric relationship are involved:

a. Dissolving of Calcium Hypochlorite

$Ca(OCl)_2 + 2H_2O \rightarrow 2HOCl + Ca(OH)_2$

b. Dissociation of hypochlorite to Hypochlorous acid.

$2HOCl \rightleftharpoons 2H^{+1} + 2OCl^-$

Sodium Sulfite is the classical method used for Hypochlorite destruction.

The clean-up personnel involved in the operation shall utilize the following safety equipment:

1. Rain gear
2. Acid gloves
3. Organic vapor/acid gas respirators (Scott Full Face)
4. Acid boots

The personnel will have available to them Scott Air Packs in case of any off gassing or emergency situations.

We further propose to overpack all 100 drums of the Trichloro-S-Triazinetrione and Sodium Dichloro-S-Triazinetrione in the following manner:

1. Overpack the drums using 4 mil plastic barrel liner and placing the fiber drums in 55 gal DOT 17H steel drums.
2. These drums will be placed on a flat rack and transported to Crosby & Overton, Inc. and T.S.D. for temporary storage.

Sincerely,

Michael T. Goldstein

Michael T. Goldstein
Technical Director
Chemical Packaging Division

MTG/sy

GROW GROUP, INC.
CONSUMER PRODUCTS DIVISION

760 South Vail Avenue
Montebello, CA 90640
Telephone (213) 724-6530

1 OF 4

B

CERTIFIED MAIL

September 9, 1986

SEP 15 1986

U.S. EPA Region IX
RCRA Programs Section (T-2-1)
Toxics & Waste Management Division
215 Fremont Street
San Francisco, CA 94105

Dear Sir,

Enclosed please find the completed "Notification of Hazardous Waste Activity", EPA Form 8700-12 (Rev. 11-85) necessary to transfer EPA I.D. number CADO 85393080 from Georgia-Pacific Corporation to Grow Group, Inc., Consumer Products Division, 2501 Malt Avenue, City of Commerce, CA 90040.

Thank you for your assistance in completing this matter.

Sincerely,

Michael T. Goldstein

Michael T. Goldstein
Technical Director
Consumer Products Division

MTG/sy

Enclosure

2 of 4 9-9-86

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

For Official Use Only

Comments

C C

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
C E	T/A C 1	

I. Name of Installation

GROW GROUP INC CONSUMER PRODUCTS DIVISION

II. Installation Mailing Address

Street or P.O. Box

C 3: 2501 MALT AVENUE

City or Town	State	ZIP Code
C 4: CITY OF COMMERCE	CA	90040

III. Location of Installation

Street or Route Number

C 5: SAME AS ABOVE

City or Town	State	ZIP Code
C 6:		

IV. Installation Contact

Name and Title (last, first, and job title)	Phone Number (area code and number)
C 2: GOLDSTEIN M. TECHNICAL DIRECTOR	213 724 6530

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership (enter code)
C R: * SEE ATTACHMENT	P

VI. Type of Regulated Waste Activity (*Mark 'X' in the appropriate boxes. Refer to instructions.*)

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (*enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.*)

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation (*transporters only — enter 'X' in the appropriate box(es)*)

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: CAD085393080

Continue on reverse

ID — For Official Use Only

C														T/A	C
W															1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)*   ☒ 2. Corrosive *(D002)*   ☒ 3. Reactive *(D003)*   ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
[signature]	Robert L. Carsten Vice President & General Manager	8/18/86

GROW GROUP INC.
CONSUMER PRODUCTS DIVISION
2501 MALT AVENUE
CITY OF COMMERCE, CA 90040

EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

V. OWNERSHIP

A. Name of Installation's Legal Owner:

Grow Group Inc.
200 Park Avenue
New York, New York 10166

Kilsby Tube Supply Company
9500 Telstar Avenue
El Monte, CA

Goodyear Tire & Rubber Company
1144 E. Market Street
Akron, Ohio 44316

GROW GROUP, INC.
4000 Dupont Circle
Louisville, Kentucky 40207
Telephone: (502) 897-9861

July 17, 1986

Hazardous Waste Materials Branch
U. S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco 94105

Dear Sir or Madam:

This is a notification that the ownership of the facilities listed below will be transferred from Georgia-Pacific Corporation, Chemical Packaging Division to Grow Group, Inc., on or about July 28, 1986.

The Resource Conservation and Recovery Act (RCRA) hazardous waste generator I.D. numbers listed below are applicable to these facilities and it is requested that these I.D. numbers be transferred to Grow Group, Inc.

Facility Name (Location)	RCRA I.D. No.
City of Commerce, CA. 2501 Malt Avenue 90040	CADO 85393080
Montebello, CA. 760 So. Vail Avenue 90640	CADO 9380890
Vernon, CA. 1726 Loma Vista Avenue 80058	CADO 20747655

Should you have any questions or require additional information, please advise.

Best regards,

Henry W. Jones

Henry W. Jones
Manager, Environmental Affairs

/ds
cc: M. Goldstein
D. B. Russell
W. H. Russell

Georgia-Pacific Corporation
760 South Vail Avenue
Montebello, California 90640
Telephone (213) 724-6530

July 29, 1985

Mr. Michael Feeley
Hazardous Materials Branch
U.S. EPA - Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Feeley,

RE: Georgia-Pacific Corporation
Hazardous Waste Activities
2501 Malt Avenue
City of Commerce, CA 90040

Because of present and impending impacts of the 1984 R.C.R.A. Amendments upon T.S.D. Interim Status Facilities, Georgia-Pacific has evaluated its operations at the above listed facility. A thorough review of our operations and the regulations leads us to conclude that the "TSD Interim Status" should be changed to that of generator only. We base our conclusions on the following:

1) Our initial Hazardous Waste Activity Notification and Federal Part A Hazardous Waste Application were made as a protective filing in an attempt to ensure compliance with regulations that were new, complicated and uncertain.

2) We are enclosing a drawing of our wastewater system that clearly demonstrates that the system is exempt from TSD regulation by conforming to the definitions (see 40 CFR Part 260.10) of:

   A. a totally enclosed treatment facility, (40 CFR Part 264.1(g)(5), and;

   B. an elementary neutralization unit. (40 CFR Part 264.1(g)(6).

3) Georgia-Pacific does not presently nor do we intend to store any hazardous waste beyond 90 days at this facility.

We therefore request withdrawal from TSD Interim Status with retention of generator only status for our continuing need and future compliance.

Your early written confirmation of these requests will be appreciated. Should you have any questions concerning the requests, please call at your convenience.

Sincerely,

Michael T. Goldstein

Michael T. Goldstein
Technical Director
Chemical Packaging Division

MTG/sy
Enclosure
cc: Ray Plate, Commerce
Bob Carsten, Newport Beach
F. McCaig; D. Dutton; R. Horder; Atlanta

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

August 16, 1985

Michael T. Goldstein
Technical Director
Chemical Packaging Division
Georgia-Pacific Corporation
760 South Vail Avenue
Montebello, CA 90640

Re: City of Commerce Facility (EPA ID# CAD085393080)

Dear Mr. Goldstein:

This letter is in response to your request for withdrawal of your permit application for the facility referenced above, submitted pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA).

On January 11, 1983, EPA granted Interim Authorization to the State of California to operate Phase II, Component A of its hazardous waste program in lieu of the Federal program. This authorization includes authority to issue RCRA permits for facilities that treat or store hazardous waste in tanks, containers, and piles. Your facility now falls under State jurisdiction and we have transferred your Part A application to the California Department of Health Sevices.

Your request and a copy of this letter will be forwarded to:

Mr. John Masterman, Permits Coordinator
California DOHS
Toxic Substances Control Division
714 "P" Street
Sacramento, CA 95814

and to the appropriate regional office of Department of Health Services. In the future, please contact DOHS regarding any permit activities covered under the authorization.

If you have any questions, please contact our Industry Assistance Office at (415)974-7472.

Sincerely yours,

Michael T. Feeley
Chief, RCRA Programs Section
Waste Programs Branch

cc: John Masterman, Sacramento DOHS
Regional Office, Los Angeles DOHS

1 of 2

4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

0 4 SEP 1986 or 1985 ? Hard

In Reply
Refer to: T-2-1

John Hinton
T.S.C.D. - Permits
Department of Health Services
107 S. Broadway, Room 7011
Los Angeles, CA 90012

Re: Georgia - Pacific Corporation, Montebello
(EPA ID No. CAD009380890)

Dear Mr. Hinton:

The referenced facility has requested withdrawal of its Part A permit application. The signed RCRA Reversion Agreement specifies procedures for handling Part A withdrawal requests. Specifically, DHS will:

- Review and decide whether to approve or disapprove the withdrawal request,
- Notify the facility of your decision, emphasizing that the facility must also obtain a decision from EPA,
- Send a copy of the decision and all relevant materials to EPA.

EPA has agreed to:

- Conduct a timely review of the documents and DHS response to the facility,
- If our decision differs from yours, contact you to discuss the decision prior to contacting the facility, and
- Notify the facility of our decision.

I am enclosing a copy of the facility's request for withdrawal. When I receive a copy of your decision and relevant documents, I will review them and notify you and the facility of our final decision.

Sincerely,

Michael T. Feeley
Chief, RCRA Programs Section

Enclosure

cc: Sherri Park, DHS Headquarters
Michael T. Goldstein, Georgia - Pacific Corporation

ECOLOGY AND ENVIRONMENT, INC.

717 W. Temple Street
Suite 202
Los Angeles, CA 90012
(213) 481-3870

CAD 085393080

TELECOPIER - (213) 250-8915

TELECOPIER TRANSMISSION FORM

DATE: 9/21/88 TIME: 1500 hrs. TOTAL NO. OF PAGES: 18
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TO: ~~MARIA CRUZ~~ Bill Lewis

COMPANY: E+E San Francisco

TELECOPIER PHONE #

FROM: NANCY PARSON LA.

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ecology and environment, inc.
717 W. TEMPLE ST., LOS ANGELES, CA 90012, TEL. 213-481-3670
International Specialists in the Environment

DRAFT

September 21, 1988

U.S. Environmental Protection Agenc
215 Fremont Street
San Francisco, CA 94105

Ref. No. 19-0988-006
TDD No. T9-8809-002
PAN No. TCA0834-OMA

Attention: William E. Lewis, Deput Project Officer

Subject: Grow Group, Inc. On-Scene Monitoring, Commerce, CA

On September 3, 1988, at 0610 hou s, the Technical Assistance Team (TAT) was tasked by Environme tal Protection Agency (EPA) On-Scene Coordinator (OSC) W. E Lewis to respond to an unknown chemical situation involvin an evacuation in Commerce, California.

TAT arrived on scene at 0710 hours and was directed to the Los Angeles County Sheriff Departme t (LACSD) Command Post. Briefing by Deputy M. Pippin reveal d that LACSD was conducting the evacuation and had limited info mation regarding the actual release. What was known was th t a chlorine gas release occurred earlier that morning at the Grow Group, Inc. (GGI) facility located at 2501 Malt Str et in Commerce, California (see Attachment A). Chlorine ga had been generated by the decomposition of tricholorisocyanur c acid (C13CYA). LACSD had evacuated 23,000 residents.

TAT was escorted by the LACSD to t e on-scene command post set up by the Los Angeles County Fir Department (LACFD). Upon arrival, TAT did not observe a isible plume. Captain M. Sandeman of LACFD explained that t ey first responded at 0020 hours to investigate a report f chlorine odor. Captain Sandeman reported that the vapo cloud had been slow to dissipate due to unusual weather conditions - no prevailing winds and high humidity. Becau e the wind was constantly shifting direction, new areas were continually evacuated (see Attachment B for evacuation bounda ies). Seven employees from a nearby paper plant had been h spitalized as a result of

DRAFT

exposure to the chlorine vapor clou .

Captain Sandeman stated that appar ntly a few fiber drums of Cl3CYA stored in a warehouse b gan decomposing causing an exothermic reaction and subseque t chlorine gas generation. LACFD entered the drum storage war house in Level A protection and attempted to remove several rums blocking the reacting drums stored in the rear of the wa ehouse(see Attachment C for site diagram). Visibility was poo and the forklift did not operate properly due to lack of ox gen. After attempts failed to remove the blockage, the rear o the metal building was cut through to reach the drums and rem ve them. The LACFD dumped the drums to spread out the react ng material and neutralized the hot material with a soda as slurry which stopped the chlorine gas generation. The rema ning material on the tarmac was covered with dry soda ash to prevent further flare-ups. The only water used by the LACFD wa to make this slurry, there was no run-off water. See Attachment D for photo documentation.

Donald Green, GGI's Director of Re earch and Development, was on-site. He confirmed that t e chemical involved was trichloro-s-triazinetrione also kn wn as trichloroisocyanuric acid. Mr. Green stated that the Cl CYA could have reacted with some type of reducing agent. Ther was some uncertainty as to the exact contents of the drums nd whether they contained waste or product material. Mr. Gr en also stated that GGI had contracted Disposal Control Servic , Inc. (DCS) for clean up and mitigation.

During the incident, South Coa t Air Quality Management District (SCAQMD) personnel were resent and monitoring wind direction and speed. M. Stimson f SCAQMD reported that the vapor cloud remained visible from approximately 0300 to 0700 hours. Wind speed remained consist nt, from one to three miles per hour, however, wind direction aried from southwesterly to southeasterly . At approximately 900 hours, after the vapor cloud had dissipated, SCAQMD coll cted air samples for later analysis at their laboratory (see ttachment E). No real time air monitoring was performed for specific chemical constituents.

At 1035 hours, the Los Angeles C unty Department of Health Services (LADHS) assumed the rol as lead agency when LACFD reported the reaction was contain d. Approximately 400 30-gallon fiber drums containing conta inated, unusable Cl3CYA and soda ash were stored in the wareho se. The drums were in poor condition and the instability f the material posed an immediate risk to public health nd the environment due to threat of release. In addition t the risk the drums posed, there was some unneutralized mat rial left on the ground by LACFD which had been covered w th a dry soda ash. LADHS

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provided a 24 hour watch to monitor the remaining C13CYA for any sign of reaction until the loose material could be neutralized and the drums overpacked and removed from the site.

It was learned that GGI is a publicly owned, nationwide company headquartered in New York. This facility packages pool chemicals, manufactures bleach and holds plastic bottles and is located in an industrial area that is surrounded by densely populated residential sections. The land is leased from Georgia Pacific who sold the facility to GGI two years ago. GGI purchases the C13CYA in powder form and then granulates or presses it into tablets for consumer use. There were two types of C13CYA waste that had been stockpiling in the warehouse for the past three years (and even longer as GGI purchased some of the waste along with the facility in August of 1985). The granulation waste consists of soda ash and C13CYA and is now obsolete due to a change in the manufacturing process. The tableting waste is floor sweepings from the tablet pressing room and consists of C13CYA and debris. The tableting waste is now being treated on site (reacted with sodium sulfite and reclaimed for bleach manufacturing or, if unreclaimable, neutralized with sodium carbonate or sodium hydroxide and sewered). Due to process changes and installation of the treatment unit, this waste is no longer being stored.

There were two suppositions as to what actually caused the C13CYA to begin decomposing. The first is that the C13CYA begin reacting with some organic material from the debris in the floor sweepings. The second theory was postulated from the condition of the aluminum warehouse ceiling. It was noted that there was an absence of sealer pigment over the C13CYA drums portion of the warehouse, whereas, the other three-quarters of the warehouse which stored empty plastic bottles and resin had intact sealer on the ceiling. Many of the C13CYA drums had an oily layer on their tops and an oily substance was noted to be dripping from the ceiling. This could have come in contact with exposed material and reacted.

At 1200 hours, after providing an update to OSC R. Martyn, TAT departed the site. No further clean up would be conducted until 2000 hours due to heat stress factors. The DCS workplan was to containerize the loose C13CYA from the tarmac and overpack the questionable drums of C13CYA in the warehouse while researching a disposal option for this material. The neutralized C13CYA (by LACFD with the soda ash slurry was to be treated on-site by GGI personnel working extra shifts. LADHS would remain on site for observation.

On Sept. 4, 1988, at 0620 hours, TAT was tasked by OSC Martyn to investigate a report of a second chlorine gas release at the GGI facility. At 0730 hours TAT arrived on-scene and observed no visible plume. LACFD, LADHS, LACSD & SCAQMD were

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present. An evacuation of 1000 res dents had been conducted in the adjacent city of Montebello.

The second release occurred while DCS was in the process of shoveling up the loose Cl3CYA (co ered with dry soda ash by LACFD) from the tarmac and contai erizing it in a hopper and drums. Chlorine gas and smoke beg n releasing from a drum and the hopper and both were dumped to spread the chemical on the tarmac to lessen the reaction. However, the chlorine gas generation became unmanageable an DCS called LACFD at 0520 hours to assist in controlling the reaction. The LACFD controlled the reaction by smother ng the hot coals with soda ash. One DCS employee was taken o the hospital for dermal exposure symptoms.

Again, the reaction was contained a d TAT had provided periodic updates to OSC Lewis during this se ond incident. TAT departed the site at 1400 hours after ins ring that LADHS personnel would monitor the situation. DC would resume work at 2000 hours.

TAT returned to the GGI facility at 2030 and observed the first batch of neutralized CL3CYA mater al undergoing treatment. A safety meeting was being held wit DCS, LACFD, LADHS and GGI representatives in attendance. DC would resume work in Level B protection with Level A standby. LACFD was to also standby. O. H. Materials (OHM) had been cal ed in on a consulting basis to provide continuous air monitori g. A Gastech chlorine gas meter was used with a 1 ppm action evel set.

DCS resumed neutralizing the loo e CL3CYA from the tarmac. They completed about 90% of the neu ralization Sunday night and finalized it Monday night. Dur ng the remaining cleanup activity, OHM continuously monitor d the hot zone perimeter. It was reported that readings never exceeded 0.25 ppm.

Approximately 30 drums of neutral zed Cl_3CYA were collected during this clean-up effort. This material was treated onsite by GGI personnel from September 4 t rough September 6.

During the week of September 4, D S overpacked approximately 425 drums. The overpacks, contami ated soil (from the rear of the warehouse where the hole had b en cut) , and approximately 100 drums of hazardous waste were transported to Appropriate Technologies in Chula Vista for t eatment. The 100 drums of hazardous waste had been stored i a different shed on site. Their labeling was incomplete a d container integrity was questionable, so LADHS recommended they be properly disposed of. The majority of these drums we e manifested as oxidizers.

On September 9, an Administrative earing was held to cite GGI for violations. Some attendees w re GGI, Los Angeles County

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District Attorney, California Dep.rtment of Health Services, LADHS and SCAQMD. At no time dur.ng this incident were any facility operations shut down. A :ease and desist order of a very general nature was given .y LADHS to keep company personnel out of the hot zone. Se· Attachment F for a history of violations and releases at this acility.

TAT returned to GGI on September 13 to verify completion of the removal action and to insure t.at storage of any other hazardous material posed no add tional threat of release. During the site inspection TAT f·und approximately 50 drums stored outside a warehouse that ·ere unlabeled and in poor condition. J. Mahar and A. Shah of GGI were unsure of the contents of these drums but assured TAT they would identify and dispose of them properly. TAT not fied M. Garcia of LADHS of this finding and Mr. Garcia stat d that LADHS would provide follow-up. Complete removal of C 3CYA waste was verified by visual inspection of the drum stora·e warehouse and manifests.

With the removal complete and LADH· committment to monitor the proper disposition of the remaini.g questionable drums, TAT notified OSC Lewis of the site sta.us. It was determined that further EPA/TAT involvement was unn·cessary.

If you have any questions regardi.g this emergency response, please do not hesitate to contact t.is office.

Sincerely,

Nancy Parson
Technical Assistance Team Member

cc: R. Martyn
File

NP:st

Attachments

Attachment A

SOURCE : Thomas Bros Maps

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SITE LOCATION MAP
GROW GROUP, INC.
COMMERCE, CA

Attachment B

SOURCE : Los Angeles Times

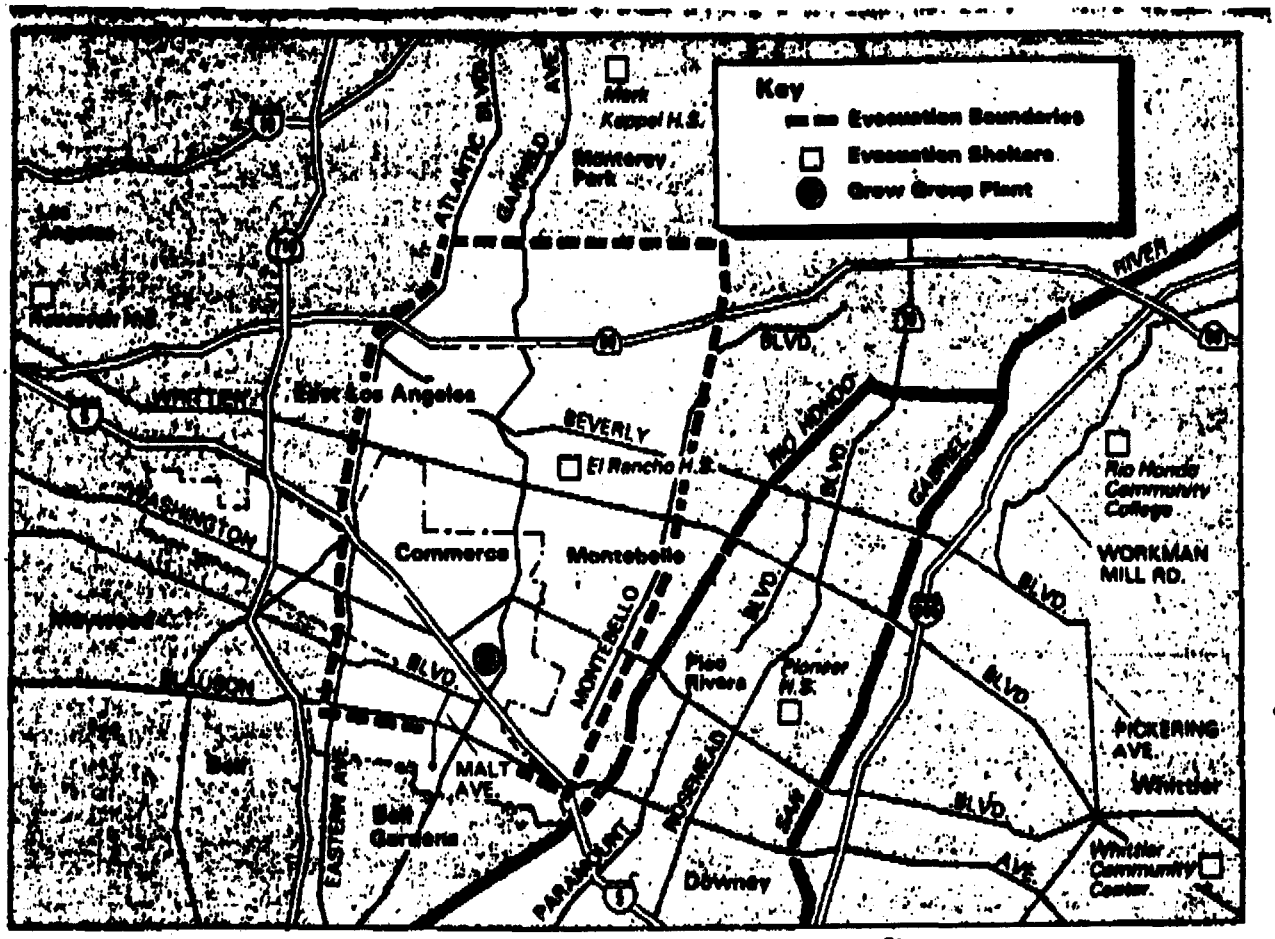

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FIGURE 3
EVACUATION BOUNDARIES
GROW GROUP, INC.

Attachment C

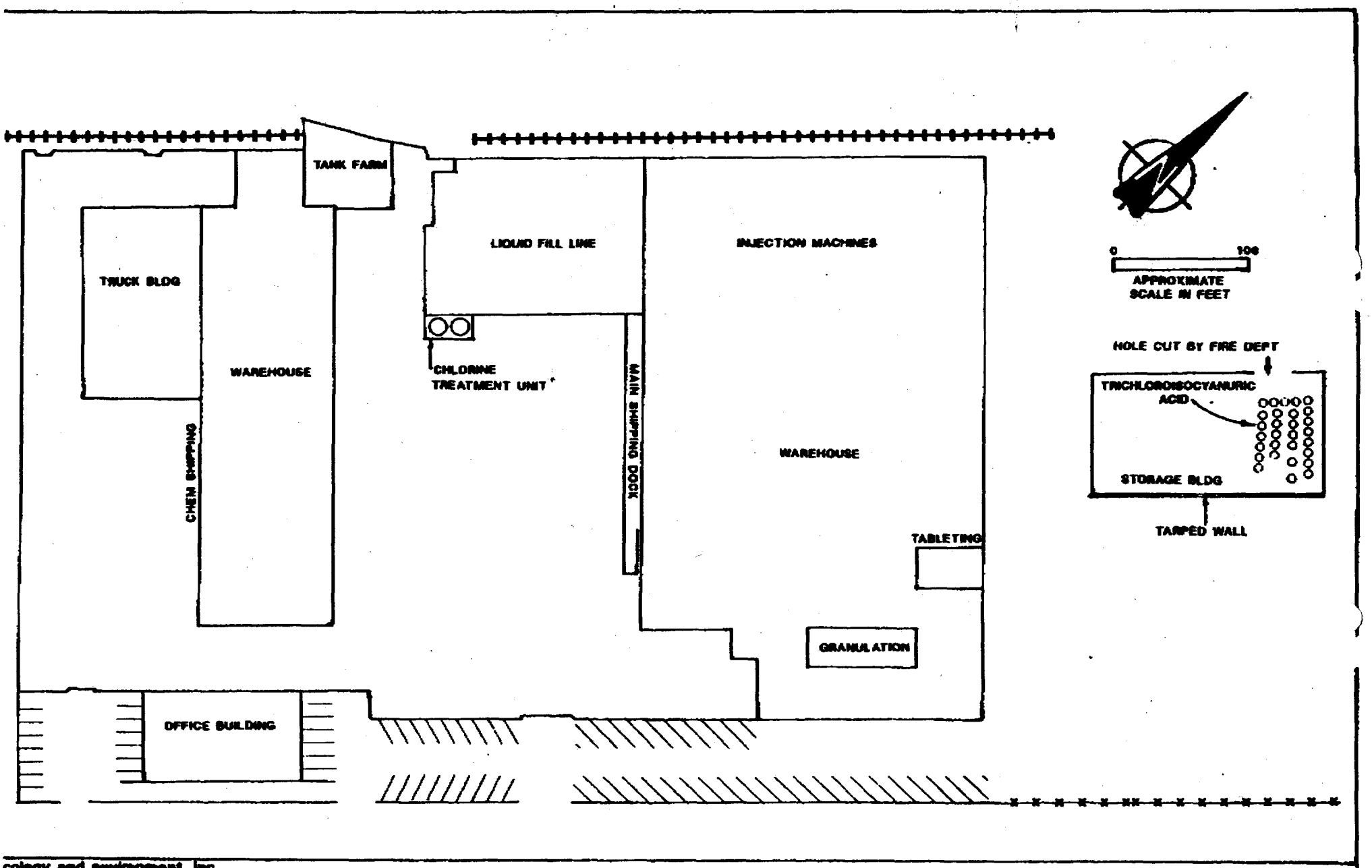

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FIGURE 2
SITE DIAGRAM
GROW GROUP, INC.
COMMERCE, CA

Attachment D

Photographs unavailable at this time

Attachment E

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
LABORATORY SERVICES

Sample Source: Grow Group, Inc.
2501 Malt Avenue
Commerce, CA 90040

(concentration in ppb)

Component	Down Wind	Up Wind	Command Post	Hot Zone
Trichloromethane (chloroform)	0.4	<0.5	*	1.8
1,1,1-trichloroethane (methyl chloroform)	10.6	10.9	11.4	10.8
Tetrachloromethane (carbon tetrachloride)	0.44	0.24	0.25	0.71
1,1,2-trichloroethene (trichloroethylene)	0.42	0.40	0.41	0.45
Tetrachloroethene (perchloroethylene)	1.73	1.81	2.07	1.74
Dichloromethane (methylene chloride)	292	<18.6	*	308
1,2-Dichloromethane	<34	<35	*	<34
1,2-Dibromoethane	<0.1	<0.1	<0.2	<0.1

* Interference

by ECD/GC

Attachment F

Grow Group, Inc.

Summary - Violations, Releases

Releases/Incidents

- Prior to 1988: two chlorine gas releases (at least one during Georgia Pacific ownership)
- February 1988: trichloroisocyanuric acid waste was being trucked to the Puente Hills landfill when it caught fire in the truck. Upon investigation it was discovered this had occurred previously.
- August 1988: chlorine gas release from a 30-gallon drum of waste tricholorisocyanuric acid

Violations

- Illegal storage of waste
- No sewering permit
- Inadequate contingency plan

Unofficial results; 9/9/88 Hearing

- No permit to treat (California Department of Health Services)
- Occupancy violation; greater than 500 pounds stored (Los Angeles County Fire Department)

NOTE: Specifics on violations are not final at this time; case is still under investigation.

This summary was compiled by TAT through interviews with Los Angeles County Department of Health Services personnel in both the Enforcement and Environmental Management Sections.

State of California

Department of Health Services

Memorandum

To : John Hinton

EPA#

CAD085393080

Date : June 6, 1984

Subject: Georgia Pacific, Malt Avenue, City of Commerce, CA 90040 - CAD 58538308

From : Megan Robinson MR

On 5-2-84 an inspection was performed on the aobve subject determining compliance with State and Federal Regulations. A determination is requested of this offoce regarding facility operation status. Part A was filed November 1980. On 12-9-81 Susan Romero of this office ~~filed an ISD application~~ filled out an ISD Questionnaire per Telecon with M. Goldstein. RT yet an ISD was never issued. Presently there is simple neutralization onsite which includes underground tanks. This is controlled by the County Sanitation District. The clarification unit is to be upgraded and removal of the old unit may be warrented.

It is the advise of the writer Georgia Pacific be listed under generator status with EPA/RCRA program. These current status is ineffective in determining which role our Department shall play in compliance and enforcement.

cc: Paula Rasmussen

Pls. clarify. I don't work for the mentioned facility + I never filed an ISD appln. SPR 1/20/87.

INTERVIEWER: Romero, S. B

DATE: 12/9/81

CAD085393080

GEORGIA-PACIFIC CORPORATION
2425 MALT AVE
CITY OF COMMERCE CA 90040

EPA ID NO: CAD085393080

CONTACT PERSON: Michael Hel

PHONE: (213) 724-6530

	YES	NO	NA
1. Does the facility engage in any of the following:			
Storage			
- tanks (2 - 1 underground, 1 surface)	✓		
- ponds or lagoons	—	✓	—
- nonstationary containers (bags, bins, bottles, cans, cartons, drums)	✓	1	—
Transfer Station (waste temporarily stored, waste is not generated nor disposed of at the site)	—	✓	—
Treatment (Totally Enclosed Treatment)	✓	—	—
Incineration	—	—	—
- solids	—	✓	—
- liquids	—	✓	—
- slurries	—	✓	—
- sludges	—	✓	—
Disposal	—	—	✓
- landfarm/landspreading	—	—	✓
- landfill	—	—	✓
- underground injection well	—	—	✓
- ponds or lagoons	—	—	✓
- disposal cell for specific wastes	—	✓	—
Recycling/Resource Recovery			
2. Does the facility handle:			
- toxic waste	✓	—	—
- extremely hazardous waste	—	✓	—
- flammable waste	✓	—	—
- water reactive wastes	✓	—	—
- strong oxidizers	✓	—	—
- volatile wastes	✓	—	—

FACILITY: Georgia Pacific Corporation EPA ID NO: CAD085393

	YES	NO	NA
- liquid wastes, in bulk	✓		
- liquid wastes, in containers		✓	
- waste in powder or dust form	✓		
- asbestos		✓	
- explosive waste		✓	
- alkalies	✓		
- acids	✓		
- cyanides			
- pesticides		✓	
- PCB		✓	
3. Does the facility have on site:			
- nonpotable water	✓	✓	
- public water supply			
- private water supply		✓	
4. Is the facility			
- fenced	✓		
- operating at night	✓		
5. Is the facility equipped with:			
- warning signs in English and in Spanish			
- telephone or radio transmitter	✓		
- safety shower	✓		
- eyewash	✓		
- first aid supplies	✓		
- protective clothing	✓		
- warning/alarm system	✓		
6. Is this facility handling only wastes generated by the company owning or operating the site?	✓		

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY — GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7128
LOS ANGELES, CA 90012
(213) 620-2380

NOTICE OF VIOLATION AND DIRECTIVE TO COMPLY

EPA ID Number: CAD085393080

Inspection Date: 5-21-84

Facility: Georgia Pacific
2504 Malt Ave.
Commerce, Ca. 90040

On the above date an inspection of your Hazardous Waste Facility was conducted under authority of Section 25185, California Health and Safety Code and Section 66328, California Administrative Code.
You are directed to correct the violations noted below:

265.73b Maintain records at the facility on storage of waste. ~~records~~

265.16d Update the personnel records and training program to include all requirements of CFR 40.

265.51 Update contingency plan to include written plan as it pertains to hazardous waste regulations.

265.173 Properly close and label all hazardous waste containers and store in a hazardous waste site.

Facility Representative:
Cassandra Bizon
(signature)
Cassandra Bizon
(name)
QC Supv
(title)

Authorized State Agent:
Megan Robinson
(signature)
Megan Robinson
(name)
5-21-84
(date)

Hazardous Waste Compliance Monitoring and Enforcement Log

1. EPA ID: ICAD018513913
2. HANDLER NAME: Georgia Pacific
3. ADDRESS: 2501 Malt Ave. City of Commerce Ca.

4. HANDLER TYPE:
- ☐ MAJOR
- ■ NON-MAJOR
- ☐ GENERATOR
- ☐ TRANSPORTER
- ■ OTHER(S)

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 5/24/84 (M, D, Y)

6. TYPE OF EVALUATION COVERED BY THIS REPORT:
- ☒ EVALUATION INSPECTION
- ☐ SAMPLING INSPECTION
- ☐ RECORD REVIEW
- ☐ SPECIAL INSPECTION
- ☐ FOLLOW-UP
- ☐ MEETING (1)

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 5/24/84 (M D Y)

8. AREA AND CLASS OF VIOLATION (enter number of violations by area and class):

Class of Violation	Area of Violation					
	GWM	CI/PC	Fin. Res.	Pt. B	Comp. Sched.	Other
I						
II						1
III						3

9. ENFORCEMENT ACTIONS FOR CLASS I and II VIOLATIONS

Area of Violation	Type of Action Taken (circle one) Include Mutual Settlements					Date Action Taken (m/d/y)	Compliance Dates (m/d/y) Scheduled	Compliance Dates (m/d/y) Actual	Penalty (2) Assessed	Penalty (2) Collected
Drum Storage	Informal	(NL/NOV)	AO	CivAc	CrimAc	5/21/84	6/18/84	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		
	Informal	NL/NOV	AO	CivAc	CrimAc	/ /	/ /	/ /		

10. COMMENTS: Legal Referral-date (2)
Out of Court Settlements-date
Successful Prosecutions

1) Include Explanations for these items..

11/7/83

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY — George Deukmejian, Govern.

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7128
LOS ANGELES, CA 90012
(213) 620-2380

FACILITY INSPECTION REPORT

Date of Inspection: 5/21/84

EPA I.D.: CAD085393080 — Inspector's Name: Megan Robinson

Facility Name/Address	Mailing Address	Ownership
Georgia Pacific 2501 Malt Ave. City of Commerce, Ca. 90040	Georgia Pacific 2501 Malt Ave. City of Commerce Ca 90040	Georgia Pacific Atlanta Georgia

County: L. A.

Type of business: Repackage + Manufacturing

Persons present: Cassandra Biron, Raymond Plate, Mike Goldstein, Megan Robinson

Contact Person: Cassandra Biron

Phone: 213 724-6530

Samples taken: Yes ___ (receipt attached) No X — Avg. Gen. Rate (month): ___

Plan of Correction necessary: Yes X (Due date: 6-8-84) No ___

Discussion with Management:
Currently Facility does not hold an ISD for TSD activity. Activities will include automated treatment ~~of~~ of pH neutralization prior to discharge to sewer system (STP). Also dechlorinazation is utilized prior to pH adjustment. It is recommended by the inspector this company have a variant for ISD status due to regulation by other agencies and the satisfactory condition and activity of the facility.

Facility operating under ISD? Yes ___ No X

On this date an inspection of your facility was conducted under authority of Section 25185, California Health & Safety Code and Section 66328, California Administrative Code. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66328, California Administrative Code. Specific violations of one or more Sections of the California Health & Safety Code, Division 20; California Administrative Code, Title 22; or Code of Federal Regulations, Part 40 are noted on the attached document. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

Authorized Representative of Firm*	Authorized State Agent
Name CASSANDRA BIRON	Name Megan Robinson
Title QC SUPV.	Signature Megan Robinson
Signature [signature]	Date 5-21-84
Date 5-21-84	

*Signature of firm representative signifies receipt of copy of this form.

Facility Name:

Refer to: ISD	Refer to: 40 CFR	ISD CHECKLIST: FACILITY WALK THROUGH	Compliance: Yes	No	N/A	Cmt #
II - 1(c)	265.14(a)	Is hazardous waste stored in a secure enclosure, building, room or fenced area which prevents unauthorized access of persons or live stock onto the active protion of the facility?		/		temporary tank 2
II 1(c)	265.14(c)	Are warning signs in English/Spanish posted and visible?	/			
II 1(d)		Is the hazardous waste area constructed of an impervious material and designed to contain spills or surface water runoff?	/			
	265.35	Is sufficient aisle space maintained to allow unobstructed movement of equipment and personnel?	/			
		IGNITABLE, REACTIVE AND INCOMPATIBLE WASTES				
III-7(a)	265.17(a)	Does owner/operator take precautions to prevent accidental ignition or reaction of ignitable or reactive waste?	/			
III-7(a)	265.17(a)	Are "No Smoking" signs dispolayed in hazardous areas? If yes, are these signs located conspicuously?				
		Are these wastes treated, stored, or disposed to prevent:	/			
III7(b)(1)	265.17(b)(1)	Generation of heat or pressure, fire or explosion or violent reaction?				
III7(b)(2)	265.17(b)(2)	Production of toxic mists, fumes, dusts, or gases?	/			
III7(b)(3)	265.17(b)(3)	Production of flammable fumes or gases?	/			
III7(b)(4)	265.17(b)(4)	Damage to structure of facility?	/			
III7(b)(5)	265.17(b)(5)	A threat to human health or the environment?	/			
		SAFETY AND EMERGENCY PROCEDURES				
II 8		If the facility is operated at night is it sufficiently lighted?	/			
II-10	265.32(a)	Does the facility have adequate telephone or radio communications to be used in the event of an emergency?	/			
II-11		Are safety showers provided and in workable conditions?	/			
II-12		Are eyewashes provided and in workable conditions?	/			

Facility Name:

Refer to: ISD	Refer to: 40 CFR	ISD CHECKLIST: FACILITY WALK THROUGH (Continued)	Compliance: Yes	No	N/A	Cmt #
		Is the following NIOSH approved equipment provided in adequate numbers?	✓			
II-14(a)		Protective headgear and face masks	✓			
II-14(b)		Chemically resistant apparel and gloves	✓			
II-14(c)		SCBA's and respirators with approved cartridges?	✓			
II-15	265.32(b)	Are emergency alarms or other communication devices capable of summoning emergency assistance available?	✓			
	265.32(c) and (d)	Does the facility have fire fighting equipment available to fight Class A or B fires?	✓			

Facility Name:

Refer to: ISD	Refer to: 40 CFR	STORAGE IN CONTAINERS	Compliance: Yes	No	N/A	Cmt #
		Are hazardous waste containers stored for more than 90 days labeled as follows:				
II-2(c)(1)		Composition and physical state of waste?				
II-2(c)(2)		Special safety recommendations and for handling?				
II-2(c)(3)		Statements calling attention to the particular hazardous properties of the waste?				
II-2(c)(4)		Amount of waste and name and address of the producer of the waste?				
II-2(c)(5)		Date of acceptance at the facility?				
II-2(d)		Are empty containers contaminated with hazardous materials stored, handled, processed and disposed of as hazardous waste?				
VIII-2	265.172	Are containers compatible with stored wastes in them?				
VIII-3(a)	265.173 (a)	Are all containers closed?				
VIII-3(b)	265.173 (b)	Are containers properly handled to prevent rupture or leakage?				
VIII-5	265.176	Are containers used to store ignitable or reactive waste stored at least 50 feet from the facility's property line?				
VIII-6(a)	265.177(a)	Are incompatible wastes stored in same contaienrs?				
VIII-6(b)	265.177(b)	Is hazardous waste added to unwashed contaienrs previously used to store incompatible waste?				
VIII-6(c)	265.177(e)	Are incompatible waste contaers physically separated from other waste areas?				

< 90 days

Facility Name:

Refer to: ISD	Refer to: 40 CFR	STORAGE IN TANKS	Compliance: Yes	No	N/A	Cmt #
VII 1(e)	265.192(c)	Do uncovered tanks have a 2 foot freeboard, dikes or containment structures?			/	
VII 1(d)	265.192(d)	If the tank is continuously fed, is there a waste feed cutoff?				
		Are tanks inspected as follows:				
VII 3(a) (1)	265.194(a) (1)	Discharge control daily	/			
VII 3(a) (2)	265.194(a) (2)	Monitoring equipment daily	/			
VII 3(a) (3)	265.194(a) (3)	Waste level daily	/			
VII 3(a) (4)	265.194(a) (4)	Construction materials weekly	/			
VII 3(a) (5)	265.194(a) (5)	Containment construction weekly	/			
II-2(a)	265.192(c)	Does each above ground hazardous waste storage tank have a spill confinement structure capable of holding the entire contents of the tank plus sufficient freeboard? (2' required)		/		
II-2(b)	265.172	Are hazardous waste storage tanks constructed of materials compatible with stored wastes or protected with liners compatible with stored wastes?	/			
II-2(d)		Is each hazardous waste storage tank and storage area marked with NFPA hazardous identification placards?	/			
II-2(e)		Are valves on hazardous waste storage tanks locked when the facility is unattended?	/			

Facility Name: Georgia Pacific

Refer to: ISD	Refer to: 40 CFR	ISD CHECKLIST: OFFICE REVIEW OF DOCUMENTS AND RECORDS	Compliance: Yes	No	N/A	Cmt #
I (2)		Is there a copy of the Interim Status Document at the facility?			/	
		OPERATION PLAN				
(3)		After receiving written notice has the operator submitted an Operation Plan?			/	
		PART A APPLICATION AND STATE QUESTIONNAIRE REVIEWED: PROHIBITED ACTS				
		The owner or operator shall not do any of the following acts:			/	
I(4)(a)		Treat, store or dispose of hazardous wastes which are not identified			/	
(4)(b)		Employ processes not described in the Part A application			/	
(4)(c)		Make substantial modifications or additions to the facility			/	
		OPERATING RECORD				
IV 1(a)	265.73(a)	Does the owner/operator maintain a written operating record at the facility?				
		Does the operating record contain:				
1(b)(1)	265.73(b)(1)	A description and quantity of each hazardous waste received, method and date of TSD.		/		
1(b)(2)	265.73(b)(2)	Location of each waste and quantity at each location with cross-referencing to specific manifest document numbers.		/		
1(b)(3)	265.73(b)(3)	Waste analyses and trial tests as specified in 265.13, 265.225, 265.252, 265.273, 265.341, 265.375 and 265.402.		/		
1(b)(4)	265.73(b)(4)	Reports and details of insidents that required implementing the contingency plan as specified in 265.56(j)	/			
1(b)(5)	265.73(b)(5)	Inspection results and records retained 3 years as specified in 265.15(d), 265.174 and 265.194	/			
1(b)(6)	265.73(b)(6)	Monitoring, testing and analytical data where required by 265.90, 265.94, 265.276, 265.78, 265.280(d)(1),265.347 & 265.377		/		

Refer to: ISD	Refer to: 40 CFR		Compliance: Yes	No	N/A	Cmt #
		STORAGE OF WASTES				
II(1)(a)		Is hazardous waste stored at the facility for more than one year without written approval from SDOHS?		/		
(1)(b)		If hazardous waste is stored at the facility for more than one year, has the owner/operator paid fees?			/	
		GENERATORS USE OF THE MANIFEST				
	262.20	Manifests are completed for all waste transported off-site				
	262.21	The following is on all manifests:				
	262.21(2)	Name, mailing address, phone #, EPA ID# of Generator	/			
	262.21(3)	Name , EPA ID# of Transporter(s)	/			
	262.21(4)	Name, address, EPA ID# of designated/alternative facility	/			
	262.21(5)	DOT Description of waste(s)	/			
	262.21(6)	Total quantity of waste(s) and type/# of containers	/			
	262.23	Required signatures	/			
	262.22	Copies of manifests are available for review	/			
	262.42(a)	Status of TSD facility copy determined if not returned in 35 days	/			
	262.42(b)	Exception reports submitted to DOHS within 45 days			/	
		OFF SITE FACILITIES USE OF THE MANIFEST				
	265.71	Are all applicable sections signed and dated certifying the waste was received?	/			
		Are discrepancies note on the manifests?	/			
		Does the facility send/give copies of the manifest to the generator, transporter and DOHS?	/			

Refer to: ISD	40 CFR		Compliance: Yes	No	N/A	Cmt #
		Are manifest records retained at the facility for atleast 3 years?	/			
	265.72	Are manifest discrepancies resolved within 15 days or			/	
		if not are such discrepancies referred to DOHS?				
	265.76	Does the facility submit a report within 15 days for all unmanifested wastes received?	/			
		MANAGEMENT OF EXTREMELY HAZARDOUS WASTE				
*		Does the operator handle extremely hazardous waste under an Extremely Hazardous Waste Disposal Permit?			/	
		WASTE ANALYSIS				
III-3(a)	265.13(a)	Does owner/operator analyze waste prior to treating, storing, or disposing of waste? (Existing publiched or documented data may be		/		Knowledge Knowledge material
		substituted for chemical analyses).				
III-3(b)	265.13(b)	Does owner/operator have a written Waste Analysis Plan?		/		May not
3(b)(1)	265.13(b)(1)	Does plan specify parameters and a rationale for selecting these parameters?		/		be needed
3(b)(2)	265.13(b)(2)	Does plan specify test methods used?		/		if exempt
3(b)(3)	265.13(b)(3)	Does plan specify sampling methods to be used? (Sampling method should be able to produce a representative sample).		/		of RCRA
3(b)(4)	265.13(b)(4)	Does plan specify the frequency with the initial analysis will be reviewed or repeated? (Analyses should be completed when process		/		
		changes or waste composition changes).				
		INSPECTIONS				
III5(a)	265.15(a)	Does the owner/operator inspect the facility at a reasonable frequency to detectmalfunctions, deteriorations and errors which	/			
		may threaten the environment and human health?				
5(b)(1)	265.15 (b)(1)	Does the owner/operator have a written inspection schedule for inspection of monitoring equipment, safety and emergency equipment operational devices and dikes and sumps etc.	/			

Facility Name:

Refer to: ISD	40 CFR		Compliance: Yes	No	N/A	Cmt #
5(b)(4)	265.15(b)(3)	Does the schedule identify the problem areas to be checked?	✓			
		PERSONNEL TRAINING				
6(a)(1)	265.16(1)	Does the owner/operator provide classroom or on the job training to facility personnel?	✓			
6(a)(2)	265.16(a)(2)	Are instructors trained in hazardous waste management procedures?	✓			
		Does training include:				
6(a)(3)	265.16(3)	Emergency response including use of emergency equipment and systems?	✓			
6(b)	265.16(b)	Has current personnel completed training?	✓			
6(c)	265.16(c)	Is an annual training review conducted?	✓			
		Does the owner/operation maintain following documents and records at the facility:				
6(d)(1)	265.16(d)(1)	Job Title for each position at the facility reltated to HWM?	~~✓~~	✓		
6(d)(2)	265.16(d)(2)	Written job description for each position listed above?		✓		
6(d)(3)	265.16(d)(3)	Written records of the type and amount of introductory and continuing training?	✓			
		CONTINGENCY PLAN				
12(a)	265.51	Does the facility have a contingency plan?	~~✓~~	✓		
13(a)	265.52(a)	Does the contingency plan describe personnel responsibilities and action to be taken in the event of fire, explosion or release of hazardous waste?		✓		Expand for Haz waste
13(c)	265.52(c)	Does the plan describe agreements with police, fire departments, hospitals, contractors and State and local emergency response teams?	✓			
13(d)	265.52(d)	Does the plan list names, addresses and phone numbers for all emergency coordinators?	✓			
13(e)	265.52(e)	Does the plan list all emergency equipment available at the facility along with its location and capabilities?		✓		

Refer to: ISD	Refer to: 40 CFR		Compliance: Yes	No	N/A	Cmt #
13(f)	265.52(f)	Does the plan include an evacuation plan including signals and alternate routes?	/			
		Is the plan reviewed and amended when:				
15(b)	265.54(b)	The plan fails in our emergency			/	
15(c)	265.54(d)	The list of emergency coordinators changes			/	
15(d)	265.54(e)	The list of emergency equipment changes			/	
		ANNUAL REPORT				
IV-3	265.75	Has the owner/operator prepared an annual report?	/			
		FINANCIAL RESPONSIBILITY				
V-1(a)	265.142(a)	Have cost estimates for facility closure been prepared?	/			
1(c)	265.142(b)	Have cost estimates been updated for inflation?	/			
		CLOSURE				
VI2(a)	265.112(a)	Does the owner/operator have a closure plan?			/	
		Does the closure plan include:				If generator not applicable
2(a)(1)	265.112(a)(1)	Description of how and when the facility partially closed (if applicable) and ultimately closed			/	
2(a)(2)	265.112(a)(2)	An estimate of the maximum inventory of wastes in storage			/	
2(a)(3)	265.112(a)(3)	Steps to decontaminate facility, equipment			/	
2(a)(4)	265.112(a)(4)	A schedule for final closure?			/	

US WASTE MANAGEMENT BRANCH
Street
CA 95814

UNI... AZARDOUS WASTE MANIFEST

20943

or type with ELITE type (12 characters per inch).

STATE ID NUMBER 83189257

GENERATOR NAME AND MAILING ADDRESS
GEORGIA PACIFIC CORP.
2425 MALT AVE.
COMMERCE CA. 90040
AREA CODE/PHONE NUMBER (213) 724-6530

MANIFEST DOCUMENT NUMBER
EPA ID NUMBER
GAD085396610990Z

TRANSPORTER NO. 1
B&B CERTIFIED DESTRUCTION CO.
10019 PANGBORN AVE.
DOWNEY CA. 90241

VEH./CONTAINER NO. 404513
EPA ID NUMBER CAT080032857

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY
VEH./CONTAINER NO.
EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY
BKK LANDFILL
2210 S. AZUSA AVE.
WEST COVINA, CA. 91792
AREA CODE/PHONE NUMBER (213) 965-0911
EPA ID NUMBER CAD067786749

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS	UN/NA NUMBER	TOTAL QUANTITY	UNIT WT/VOL	CONTAINER NO.	CONTAINER TYPE	WASTE CAT. NO.	DISP. METH.
TRICHLORO-S-TRIAZINETRIONE (OXIDIZER)	UN2468	1285	P	002	DF	141	03
SODIUM BISULFATE (ORM-B)	NONE	99200	P	12	DF	141	03

COMPONENTS	CONC. RANGE UPPER	CONC. RANGE LOWER	UNITS %	UNITS PPM
OXIDIZER - SOLID				

SPECIAL HANDLING INSTRUCTIONS
WEAR RUBBER GLOVES AND EYE PROTECTION.

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

CASSANDRA BIRON [signature]
Printed or typed full name and signature

MO. 02 DAY 01 YR. 84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
BOB Kidd [signature]
Printed or typed full name and signature
DATE REC'D & ACCEPTED MO. 02 DAY 1 YR. 84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
Printed or typed full name and signature
DATE REC'D & ACCEPTED MO. DAY YR.

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. See instructions.

[signature]
Printed or typed full name and signature

EPA ID NUMBER CAD067786749

DATE RECEIVED & ACCEPTED MO. 02 DAY 01 YR. 84

8022A (1/82)

TSDF RETAINS

...4 P Street
...ento, CA 95814

...M HAZARDOUS WASTE MANIFEST

...print or type with ELITE type (12 characters per inch)

20943

STATE ID NUMBER 83189256

GENERATOR NAME AND MAILING ADDRESS GEORGIA PACIFIC CORP 2025 HOLT AVE COMMERCE CA. 90040 AREA CODE/PHONE NUMBER (213)724-6530	MANIFEST DOCUMENT NUMBER EPA ID NUMBER CAD0-529130180990011

TRANSPORTER NO. 1	VEH./CONTAINER NO.	EPA ID NUMBER
B & B CERTIFIED DESTRUCTION CO 15019 PANGBORN AVE DOWNEY CA. 90241	6944 7194	CAT 990032857

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY	VEH./CONTAINER NO.	EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY	EPA ID NUMBER
BKK LANDFILL 2210 S. AZUSA AVE. WEST COVINA CA. 91792 AREA CODE/PHONE NUMBER (213) 965-0911	CA 0096778674[illegible]

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS	UN/NA NUMBER	TOTAL QUANTITY	UNIT WT/VOL	CONTAINER NO.	CONTAINER TYPE	WASTE CAT. NO.	DISP. METH.
CALCIUM HYPOCHLORITE (OXIDIZER)	UN1748	4415	P	344	DF	141	D3
SODIUM DICHLORO-S-TRIAZINETRIONE (OXIDIZER)	UN2465	150	P	9	DF	141	D3

COMPONENTS	CONC. RANGE UPPER	CONC. RANGE LOWER	UNITS %	UNITS PPM
OXIDIZER — SOLID				

SPECIAL HANDLING INSTRUCTIONS

WEAR RUBBER GLOVES AND EYE PROTECTION

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the ap... able requirements of the Department of Transportation and the EPA.

CASSANDRA EIRON [signature]
Printed or typed full name and signature

MO.	DAY	YR.
02	01	84

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES
B. B. Ridler [signature]
Printed or typed full name and signature

DATE REC'D & ACCEPTED

MO.	DAY	YR.
12	1	84

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE REC'D & ACCEPTED

MO.	DAY	YR.

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. See instructions.

[signature]

EPA ID NUMBER		
CAD09677867[illegible]		

DATE RECEIVED & ACCEPTED

MO.	DAY	YR.
02	07	84

TSDF RETAINS

...E OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814
(916) 322-5705

P-B-A ?

February 20, 1987

Mr. David Harris
Grow Group, Inc.
200 Park Avenue
New York, N.Y. 10166

Dear Mr. Harris:

RE: FACILITIES AT CITY OF COMMERCE, CALIFORNIA, CAD085393080
AND MONTEBELLO, CALIFORNIA, CAD009380890

The Department has been notified by Georgia Pacific Corporation that the above-named facilities have been transferred to Grow Group, Inc., effective July 31, 1986.

This letter is to inform you that it is the responsibility of the owner/operator of a hazardous waste facility to comply with state financial assurance and liability requirements pursuant to Article 17, Title 22, California Administrative Code (Enclosed).

Financial assurance may take the form of a trust fund, surety bond, letter of credit, financial test or corporate guarantee or insurance policy. Liability coverage may be provided through insurance, a financial test or corporate guarantee (state pre-printed forms DHS 8100-8110 enclosed).

Please be advised that you have 30 days from the date of this letter to submit the following documents to the Department or this matter will be referred for enforcement action.

1) A certificate of insurance, financial test, or corporate guarantee to demonstrate liability coverage for sudden accidental occurrences ($1 million per occurence per facility with a $2 million annual aggregate per facility).

2) The financial documents to satisfy the financial assurance requirements for closure costs.

The financial assurance documents should be mailed to:

Department of Health Services
Toxic Substances Control Division
Financial Responsibility Unit
714/744 P St.
P.O. Box 942732
Sacramento, CA 94234-7320

If I can be of any assistance to you, please contact me at (916) 324-2994.

Sincerely,

Iran D. Haefele

Iran Haefele
Financial Responsibility Unit
Toxic Substances Control Division

Enclosure

Grow Group, Inc.

760 S. Vail Avenue
Montebello, California
90640

Telephone (213) 724-6530

Professional and Household
Products Division

September 17,1988

Mr. Mohinder Sandhu, Chief
Facilities Permitting Unit
Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7011
Los Angeles, California 90211

Subject: Request for variance to allow on-site neutralization of trichloro-s-triazinetrione and sodium dichloroisocyanurate

Dear Mr. Sandhu:

Pursuant to conversations with Mr. William Wright of your unit, I am writing this letter on the abovementioned subject. California Code of Regulations, Title 22, Section 66310 allows for the granting of a variance from the provisions for the management of hazardous waste. Grow Group is therefore requesting a variance to allow us to neutralize on-site, the waste materials of trichloro-s-triazinetrione (TCCA) and sodium dichloroisocyanurate (SDCC) accumulated during clean-up from our tabletting and filling operations.

Section 66310 (a);(2) allows for a variance if a hazardous waste is being handled, stored, or disposed of pursuant to regulations of another governmental agency. The neutralization of these materials complies with the discharge requirements of the Sanitation Districts of Los Angeles County. Our interim discharge permit from this agency is 11453. The resultant materials formed from the neutralization process result in no hazard to human health and safety, livestock or wildlife.

The name and address of both the waste producer and the location at which the waste is generated and will be treated, subject to the approval of this variance, are:

Grow Group Inc.
2501 Malt Avenue
City of Commerce, Ca. 90040

The TCCA waste is a solid, consisting of virtually 100% TCCA, but which has been contaminated with dust, dirt, etc. as it is swept

up from the plant floors. On a daily basis approximately 25 to 100 pounds of this material is generated. It's primary source is TCCA dust from the tabletting operation and subsequent handling operations. An MSDS sheet on the material has been attached, as well as the technical specifications on the material. The SDCC waste is also a solid, but is generated on an infrequent basis from a granular filling operation. On a weekly basis approximately 25 to 50 lbs. of SDCC waste is generated, with filling occuring perhaps every 2nd or 3rd week.

The specific variance we are requesting is the approval to treat this waste on-site to neutralize the chlorine, followed by any pH adjustments required for sewer discharge. The chemistry and procedure for the neutralization of TCCA are shown in an attachment. The hazardous properties of the material are those defined for trichloro-isocyanuric acid (the common name for TCCA) in Article 9, Section 66680, i.e. toxic, ignitable and reactive. As a waste this material meets the criteria for being hazardous in accordance with Section 66696 for toxicity, Section 66702 for ignitability and Section 66705 for reactivity. Before neutralization the waste will be managed in compliance with the provisions of Section 66508 for accumulation of hazardous waste. On a minimum weekly basis, this period will vary accordingly with the volume of waste generated, the waste will be neutralized.

The hazardous property of SDCC is defined only as being ignitable in Article 9, Section 66680. Neutralization and waste management accumulation will follow the procedures outlined above for TCCA.

It should be noted that on two previous occasions, inspectors from your Department, after observing our operations, have approved the proposed method of waste management for isolated, one time remediation efforts.

The granting of this variance is in the public interest. Dealing with this waste on-site in a safe manner represents a safer alternative to shipping, potentially reactive materials, across our public highways. On-site management as proposed, precludes the need to consume off-site commercial capacity which is already in short supply and it with allow us to deal with our waste in a timely manner.

Thank you for your departments consideration.

Sincerely,

Donald L. Green

Grow Group, Inc.
Donald L. Green
Technical Director

DLG/dg

NEUTRALIZATION PROCEDURE FOR TRICHLORO-S TRIAZINETRIONE

EQUIPMENT

- o 6000 Gallon tank equipped with aeration and mixer
- o Respirator for any potential chlorine fumes

CHEMICAL REACTIONS

Cl_3CYA = trichloro-s-triazinetrione

CYA = cyanuric acid = $C_3N_3O_3$

$$2\ Cl_3CYA + 3\ Na_2CO_3 \xrightarrow[H_2O]{} 6\ NaOCl + 3\ N_2 + 6\ CO_2$$

$$NaOCL + Na_2SO_3 \longrightarrow NaCl + Na_2SO_4$$

NaOCL: sodium hypochlorite; Na_2SO_3: sodium sulfite; NaCl: salt; Na_2SO_4: sodium sulfate

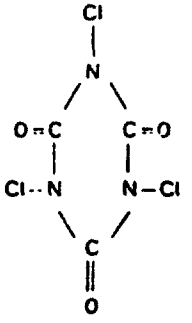
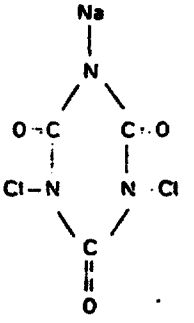
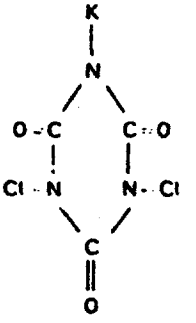
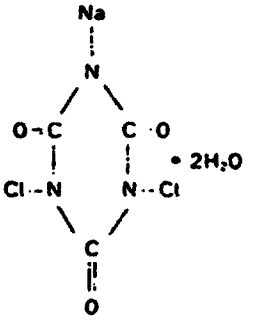
PROCEDURE

1. Weigh the amount of TCCA waste to be neutralized.
2. Fill the outdoor neutralization tank to approximately 3000 gal. with warm water.
3. Add a quantity of soda ash (Na_2CO_3) equal to 1.1 times the weight of TCCA. The resultant pH should be in excess of 10.0, if not, add more soda ash in 25 lb. increments until the desired pH is reached.
4. Mix until dissolved.
5. Slowly add the waste TCCA in 25 lb. increments
6. Mix until all the material is dissolved.
7. Weigh out a quantity of sodium sulfite equal to 1.6 times the weight of the TCCA waste.
8. Slowly add the sodium sulfite in 25 lb. increments.
9. Mix until all materials are dissolved.
10. Sample the solution and analyze for pH and available chlorine.
11. Make any required adjustments before discharging to the sewer system.

Storage And Handling Of ACL Chlorinating Compositions

Introduction *(continued)*

Table I*

Physical and Chemical Properties of ACL® Chlorinating Compositions	ACL® 90 PLUS	ACL 60	ACL 59	ACL 56
Chemical Nomenclature:	Trichloro-s-triazinetrione Trichloro(iso)cyanuric acid EPA No.: 524-107 CAS No.: 87-90-1	Sodium dichloro-s-triazinetrione Sodium dichloro-(iso)cyanurate EPA No.: 524-106 CAS No.: 2893-78-9	Potassium dichloro-s-triazinetrione Potassium dichloro-(iso)cyanurate EPA No.: 529-105 CAS No.: 2244-21-5	Sodium dichloro-s-triazinetrione dihydrate Sodium dichloro-(iso)cyanurate dihydrate EPA No.: 524-313 CAS No.: 51580-86-0
Chemical Structure:				
Formula:	$Cl_2(NCO)_3$	$NaCl_2(NCO)_3$	$KCl_2(NCO)_3$	$NaCl_2(NCO)_3 \cdot 2H_2O$
Molecular Wt.:	232	220	236	256
Color and Physical Form:	White crystalline solid in regular, granular or extra granular grades			
Available Chlorine, %	90	62	59	55
Assay, %	>99.0	>96.0	>99.0	>99.0
Cyanuric acid, %	55.5	58.6	54.6	50.4
NaCl/KCl, %	< 0.7	< 1.0	< 0.7	1.0
H_2O, %	< 0.3	< 3.0	< 0.3	–
Melting Point, °C (with decomposition)	225-230	240-250	240-250	Loses 1 H_2O at >50 2 H_2O at >95 Decomp. 240-250
Loose Bulk Density: **(lb./cu. ft.)				
Regular:	56	–	51	–
Granular:	57	57	57	57
Extra Granular:	57	59	59	59
Solubility at 25 °C (gm/100 gm H_2O)	1.2	25	9	25
pH, 1% Solution at 25 °C:	3.0	6.0	5.9	6.0

*The above data are based on samples tested in the laboratory and are not guaranteed for all samples.

**1 gm/ml = 62.43 lb./cu. ft.

MONSANTO PRODUCT NAME

ACL® 90 PLUS CHLORINATING COMPOSITION

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MO 63167

Emergency Phone No.
(Call Collect)
314-694-1000

PRODUCT IDENTIFICATION

Synonym(s):	1,3,5-Trichloro-s-triazine-2,4,6(1H,3H,5H)-trione; Trichloroisocyanurate acid; Trichloro-s-triazinetrione
Chemical Name:	1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-trichloro-,
Chemical Formula:	$C_3N_3O_3Cl_3$
Chemical Family:	Chlorinated isocyanurates
CAS No.:	87-90-1
EPA Reg. No.:	524-107
TSCA Inventory:	1,3,5-Triazine-2,4,6,(1H,3H,5H)-trione, 1,3,5-trichloro- appears on the Inventory of Chemical Substances published by the U.S. Environmental Protection Agency (EPA) under authority of the Toxic Substances Control Act (TSCA).
DOT Proper Shipping Name:	Trichloroisocyanuric Acid, dry
DOT Hazard Class/ I.D. No.:	Oxidizer/UN2468
DOT Label(s):	Oxidizer
U.S. Surface Freight Classification:	Trichloroisocyanuric Acid (Bleach Assistant Compound, NOIBN, dry)
Reportable Quantity (RQ) Under U.S. EPA CERCLA Regulations:	Not Listed
Hazardous Chemical(s) Under OSHA Hazard Communication Standard:	This substance is identified as a hazardous chemical under the criteria of the OSHA Hazard Communication Standard (29 CFR 1910.1200): Trichloroisocyanuric acid, CAS Reg. No. 87-90-1

WARNING STATEMENTS

Keep out of reach of children.

DANGER!
HIGHLY CORROSIVE.
CAUSES IRREVERSIBLE EYE DAMAGE.
CAUSES BURNS TO SKIN.
IRRITATING TO NOSE AND THROAT.
MAY BE FATAL IF SWALLOWED.
WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES.
STRONG OXIDIZING AGENT.
CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE-CONTAINING GASES.
DECOMPOSES AT 460°F TO 480°F WITH LIBERATION OF HARMFUL GASES.

Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion.

Directions for Use:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

FOR INDUSTRIAL USE ONLY. FOR REPACKAGING OR FORMULATING AS A DISINFECTANT, SANITIZER, BACTERICIDE, FUNGICIDE OR ALGICIDE. Repackagers or formulators must obtain their own EPA Registration Number to legally market this product for these uses.

Note: Drum contains absorbent packets. Remove packets before using contents. Discard packets with reuse.

PRECAUTIONARY MEASURES

Do not get in eyes, on skin, or on clothing.
Wear goggles or face shield and rubber gloves when handling.
Avoid breathing dust or fumes.
Wash thoroughly with soap and water after handling.
Remove and wash contaminated clothing before reuse.

EMERGENCY AND FIRST AID PROCEDURES

IF SWALLOWED, drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN, immediately brush off excess chemical and flush with plenty of water. Remove contaminated clothing. Wash clothing before reuse. If irritation persists, call a physician.

IF IN EYES, flush with plenty of water. Get medical attention.

IF INHALED, remove person to fresh air. Call a physician.

Note To Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF: FIRE, if possible, isolate container in open air or well ventilated area. Flood with large volume of water.

IN CASE OF: CONTAMINATION OR DECOMPOSITION, do not reseal container.

OCCUPATIONAL CONTROL PROCEDURES

Eye Protection: Wear chemical splash goggles and have eye baths immediately available where there is potential for eye contact.

Skin Protection: Wear appropriate protective gloves and protective clothing that provide a barrier to prevent skin contact. Consult glove manufacturer to determine appropriate type glove for given application. Wash immediately if skin is contaminated. Launder contaminated clothing and clean protective equipment before reuse. Provide a safety shower at any location where skin contact can occur. Wash thoroughly after handling.

Respiratory Protection: Avoid breathing dust or vapor. Use NIOSH/MSHA approved equipment when airborne exposure limits are exceeded. Full facepiece equipment is recommended and, if used, replaces need for face shield and/or chemical splash goggles. Consult respirator manufacturer to determine appropriate type equipment for given application. The respirator use limitations specified by NIOSH/MSHA or the manufacturer must be observed. High airborne concentrations may require use of self-contained breathing apparatus or supplied air respirator. Respiratory protection programs must be in compliance with 29 CFR 1910.134.

Ventilation: Provide ventilation to control exposure levels below airborne exposure limits. Use local mechanical exhaust ventilation at sources of air contamination such as open process equipment.

Airborne Exposure Limits: Typical Product Composition:

Active Ingredient:	Trichloro-s-triazinetrione	99%
Inert Ingredients		1%
Available Chlorine		90%

OSHA PEL: None Established
ACGIH TLV®: None Established

Monsanto has adopted an internal limit of 0.5 mg/m³ TWA, 1.5 mg/m³ STEL for ACL 90 PLUS chlorinating composition.

Chlorine

OSHA PEL/C: 1 ppm (3 mg/m³)
ACGIH TLV®/TWA: 1 ppm (3 mg/m³)
TLV®/STEL: 3 ppm (9 mg/m³)

FIRE PROTECTION INFORMATION

ACL® 90 PLUS chlorinating composition is not flammable, but if heated by an outside source to a temperature of 460-480°F, this material will undergo self-sustaining decomposition with evolution of heat and dense noxious gases.

Extinguishing Media: A thermal decomposition can be extinguished by flooding with copious quantities of water or by isolating the decomposing material and allowing it to be consumed.

Special Firefighting Procedures: Firefighters and others subjected to products of decomposition should wear full protective clothing and self-contained breathing apparatus. Chlorine containing gases with traces of phosgene can be liberated at temperatures in excess of 400°F.

(Fire Protection Information Continued On The Next Page)

FIRE PROTECTION INFORMATION (Continued)

Unusual Fire and Explosion Hazards: Small quantities of water react with ACL 90 PLUS to form hazardous quantities of nitrogen trichloride which is violently explosive. See Technical Bulletin IC/WT-104 for further information.

REACTIVITY DATA

Materials to Avoid: Avoid contact with water on concentrated ACL 90 PLUS in the container. Concentrated ACL 90 PLUS in the container reacts with water to form hypochlorous acid and cyanuric acid. Also avoid contact with easily oxidizable organic material; ammonia, urea, or similar nitrogen-containing compounds; inorganic reducing compounds; calcium hypochlorite; alkalis.

Hazardous Decomposition Products: Chlorine-containing gases can be produced. Traces of phosgene can be liberated at high temperatures 400°F.

Hazardous Polymerization: Does not occur.

HEALTH EFFECTS SUMMARY

The following information presents both human experience and the results of scientific experiments used by qualified experts to assess the effects of ACL 90 PLUS on the health of industrially exposed individuals and to support the Precautionary Statements and Occupational Control Procedures recommended in this document. To avoid misunderstanding, the data provided in this section should be interpreted by individuals trained in evaluation of this type of information.

Human Experience

Dermal contact and inhalation are expected to be the primary routes of occupational exposure to ACL 90 PLUS. ACL 90 PLUS is considered to be corrosive to the eyes and skin. Exposure to ACL 90 PLUS dust or fumes has been reported to produce eye, nose, throat and respiratory tract irritation.

On contact with moisture ACL 90 PLUS readily decomposes to chlorine, hypochlorous acid and cyanuric acid. The tissue damage resulting from contact with ACL 90 PLUS is considered to result, in part, from its chlorine and hypochlorous acid decomposition products. Exposure to chlorine gas has been reported to cause burning of the eyes with lacrimation; burning of the nose and mouth with rhinorrhea; and irritation of the linings of the entire respiratory tract with coughing, a choking sensation, substernal pain, vomiting, nausea, headache, dizziness and syncope. The onset of severe respiratory symptoms following exposure to chlorine, including pulmonary edema and pneumonitis, may be delayed.

Toxicological Data

Data from Monsanto studies and from the scientific literature indicate the following:

ACL 90 PLUS

Oral LD_{50} (Rat):	600 mg/kg, Slightly Toxic
Dermal LD_{50} (Rabbit):	7,600 mg/kg, Practically Nontoxic
Eye Irritation (Rabbit, 24-hr):	Corrosive
Skin Irritation (Rabbit, 24-hr):	Corrosive
DOT Skin Irritation (Rabbit, 4-hr):	Not Corrosive

Rats were exposed by inhalation to dust of ACL 90 PLUS at exposure levels of 3.2, 10.1 and 31 mg/m³ for 6 hours/day, 5 days/week for 4 weeks. Signs of irritation including lacrimation, salivation and labored breathing were observed at the mid- and high-exposure levels. Increased adrenal weights and blood chemistry parameter alterations were also noted in the mid- and high-exposure groups. No adverse histopathological effects were observed. The no-effect level is considered to be 3.2 mg/m³.

(Health Effects Summary Continued On The Next Page)

HEALTH EFFECTS SUMMARY (Continued)

Additional Information

Contact of ACL 90 PLUS with moisture will produce cyanuric acid and hazardous chlorine gas and hypochlorous acid. A Threshold Limit Value (TLV®) has been established by the American Conference of Governmental Industrial Hygienists for chlorine. For further information on chlorine, please refer to the current edition of the *Documentation of Threshold Limit Values*. For information on cyanuric acid, please refer to the Cyanuric Acid Dry Material Safety Data Sheet.

PHYSICAL DATA

Appearance and Odor:	White crystalline solid; slight chlorine odor
Melting Point:	225-230°C (decomposes)
Loose Bulk Density (lbs./cu. ft.):	56 (regular) 57 (granular and extra granular)
pH (1% solution @ 25°C):	3.0
Solubility @ 25°C:	1.2 g/100 g H_2O

Note: These physical data are typical values based on material tested but may vary from sample to sample. Typical values should not be construed as a guaranteed analysis of any specific lot or as specification items.

SPILL, LEAK & DISPOSAL INFORMATION

THIS SPILL, LEAK AND DISPOSAL INFORMATION IS APPLICABLE FOR CONCENTRATED ACL.

Emergency Spill and Leak Information:

Contain spilled material. Any spillage of ACL should be cleaned up as soon as possible to prevent contamination with foreign material with which it may react. See "Reactivity Data" section of this document.

KEEP SPILLED MATERIAL DRY. If allowed to stand in damp or wet areas, tear-producing vapors may result.

Sweep, scoop, or vacuum up all spilled material, contaminated soil, and other contaminated material and place in clean, dry containers for disposal. Complete cleanup on a dry basis if possible. Floor sweeping compounds should not be used in the removal of ACL as fuming, fire or explosion may result. Follow all protective measures indicated in the "Occupational Control Procedures" section of this document.

As currently defined, unneutralized ACL is a *hazardous substance* under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). If 100 pounds or more are released into the environment, it must be reported to the National Response Center (800-424-8802 or 202-426-2675). Since local, state and federal laws may vary, consult your attorney or appropriate regulatory officals for information relating to spill reporting.

Keep unneutralized ACL out of sewers, watersheds and water systems.

(Spill, Leak & Disposal Information Continued On The Next Page)

SPILL, LEAK & DISPOSAL INFORMATION (Continued)

Disposal Information:

Waste Disposal: Dispose of in accordance with all local, state and federal regulations.

As currently defined in Federal Resource Conservation and Recovery Act (RCRA) regulations, ACL 90 PLUS, when discarded, is a *hazardous waste* exhibiting the characteristics of ignitability (D-001) and reactivity (D-003). See 40 CFR 261.23. Its disposal, therefore, is regulated by Federal RCRA regulations. Consult your attorney or appropriate regulatory officials for information regarding additional state and local waste disposal requirements.

Do not dispose of filled or partially filled containers in a common waste compactor. Contaminants in the compactor such as oil, sawdust, floor-sweeping compound, etc. could cause spontaneous decomposition and fusion of the material at ambient temperatures resulting in rupture of the drum.

If material is *dry*, disposal by incineration is recommended.

Do not transport *wet* material. An alternate method for disposal is by neutralization to a non-oxidizing residue which can then be discarded safely. This procedure should be undertaken only after reviewing the details of the method in Monsanto Technical Bulletin IC/WT-104 on storage and handling of ACL.

Wastes of this pesticide may cause irreversible eye damage and burns to skin and may be dangerous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Rinse empty container with water, and dispose of in the same manner.

ADDITIONAL COMMENTS

The preparation of concentrated solutions or slurries of ACL® 90 PLUS chlorinating composition is not recommended. Also, ACL 90 PLUS is not recommended for formulated bleaches containing strong alkali, surfactants or hydrated chemicals.

Environmental Toxicity Information:

48-hr LC_{50} *Daphnia magna:*	0.21 ppm, Highly Toxic
96-hr LC_{50} Bluegill Sunfish:	0.30 ppm, Highly Toxic
96-hr LC_{50} Rainbow Trout:	0.32 ppm, Highly Toxic
Oral LD_{50} Mallard Duck:	1,021 mg/kg, Slightly Toxic
8-Day Dietary LC_{50} Mallard Duck:	Greater than 10,000 ppm, Practically Nontoxic
8-Day Dietary LC_{50} Bobwhite Quail:	Greater than 7,422 ppm, Practically Nontoxic

This product is toxic to fish. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with NPDES Permit. For guidance contact the regional office of EPA.

Storage: Retie polyethylene liner after each use and keep container tightly closed. Store in a cool dry place. Do not allow water to get into container. Keep containers off wet floors. Do not contaminate water, food, or feed by storage or disposal.

Refer to Monsanto Technical Bulletin IC/WT-104 for detailed information on handling and storage.

DATE: 11/25/85 **SUPERSEDES:** 11/25/84

MSDS NO: M800010524

FOR ADDITIONAL NON-EMERGENCY INFORMATION, CONTACT:

MSDS Coordinator
Specialty Chemicals
Monsanto Chemical Company
314-694-1000
(A Unit of Monsanto Co.)

MONSANTO PRODUCT NAME
ACL® 60 CHLORINATING COMPOSITION

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MO 63167

Emergency Phone No.
(Call Collect)
314-694-1000

PRODUCT IDENTIFICATION

Synonym(s):	1,3-Dichloro-s-triazine-2,4,6(1H,3H,5H)-trione sodium salt; Sodium dichloroisocyanurate; Sodium dichloro-s-triazinetrione
Chemical Name:	1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3-dichloro-, sodium salt
Chemical Formula:	$C_3N_3O_3Cl_2N\alpha$
Chemical Family:	Chlorinated isocyanurates
CAS No.:	2893-78-9
EPA Reg. No.:	524-106
TSCA Inventory:	1,3,5-Triazine-2,4,6,(1H,3H,5H)-trione, 1,3,5-dichloro-, sodium salt appears on the Inventory of Chemical Substances published by the U.S. Environmental Protection Agency (EPA) under authority of the Toxic Substances Control Act (TSCA).
DOT Proper Shipping Name:	Sodium dichloro-s-triazinetrione
DOT Hazard Class/ I.D. No.:	Oxidizer/UN2465
DOT Label(s):	Oxidizer
U.S. Surface Freight Classification:	Sodium Dichloroisocyanurate (Bleach Assistant Compound, NOIBN, dry)
Reportable Quantity (RQ) Under U.S. EPA CERCLA Regulations:	Not Listed
Hazardous Chemical(s) Under OSHA Hazard Communication Standard:	This substance is identified as a hazardous chemical under the criteria of the OSHA Hazard Communication Standard (29 CFR 1910.1200): Sodium Dichloroisocyanurate, CAS Reg. No. 2893-78-9

WARNING STATEMENTS

Keep out of reach of children.

DANGER!
HIGHLY CORROSIVE.
CAUSES IRREVERSIBLE EYE DAMAGE.
CAUSES BURNS TO SKIN.
IRRITATING TO NOSE AND THROAT.
MAY BE FATAL IF SWALLOWED.
WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES.
STRONG OXIDIZING AGENT.
CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE-CONTAINING GASES.
DECOMPOSES AT 460°F TO 480°F WITH LIBERATION OF HARMFUL GASES.

Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion.

Directions for Use:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

FOR INDUSTRIAL USE ONLY. FOR REPACKAGING OR FORMULATING AS A DISINFECTANT, SANITIZER, BACTERICIDE, FUNGICIDE OR ALGICIDE. Repackagers or formulators must obtain their own EPA Registration Number to legally market this product for these uses.

PRECAUTIONARY MEASURES

Do not get in eyes, on skin, or on clothing.
Wear goggles or face shield and rubber gloves when handling.
Avoid breathing dust or fumes.
Wash thoroughly with soap and water after handling.
Remove and wash contaminated clothing before reuse.

EMERGENCY AND FIRST AID PROCEDURES

IF SWALLOWED, drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN, immediately brush off excess chemical and flush with plenty of water. Remove contaminated clothing. Wash clothing before reuse. If irritation persists, call a physician.

IF IN EYES, flush with plenty of water. Get medical attention.

IF INHALED, remove person to fresh air. Call a physician.

Note To Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF: FIRE, if possible, isolate container in open air or well ventilated area. Flood with large volume of water.

IN CASE OF: CONTAMINATION OR DECOMPOSITION, do not reseal container.

OCCUPATIONAL CONTROL PROCEDURES

Eye Protection: Wear chemical splash goggles and have eye baths immediately available where there is potential for eye contact.

Skin Protection: Wear appropriate protective gloves and protective clothing that provide a barrier to prevent skin contact. Consult glove manufacturer to determine appropriate type glove for given application. Wash immediately if skin is contaminated. Launder contaminated clothing and clean protective equipment before reuse. Provide a safety shower at any location where skin contact can occur. Wash thoroughly after handling.

Respiratory Protection: Avoid breathing dust or vapor. Use NIOSH/MSHA approved equipment when airborne exposure limits are exceeded. Full facepiece equipment is recommended and, if used, replaces need for face shield and/or chemical splash goggles. Consult respirator manufacturer to determine appropriate type equipment for given application. The respirator use limitations specified by NIOSH/MSHA or the manufacturer must be observed. High airborne concentrations may require use of self-contained breathing apparatus or supplied air respirator. Respiratory protection programs must be in compliance with 29 CFR 1910.134.

Ventilation: Provide ventilation to control exposure levels below airborne exposure limits. Use local mechanical exhaust ventilation at sources of air contamination such as open process equipment.

Airborne Exposure Limits: Typical Product Composition:

Active Ingredient:	Sodium dichloro-s-triazinetrione	96%
Inert Ingredients		4%
Available Chlorine		62%

OSHA PEL: None Established
ACGIH TLV®: None Established

Monsanto has adopted an internal limit of 0.5 mg/m³ TWA, 1.5 mg/m³ STEL for ACL 60 chlorinating composition.

Chlorine

OSHA PEL/C: 1 ppm (3 mg/m³)
ACGIH TLV/TWA: 1 ppm (3 mg/m³)
TLV®/STEL: 3 ppm (9 mg/m³)

FIRE PROTECTION INFORMATION

ACL® 60 chlorinating composition is not flammable, but if heated by an outside source to a temperature of 460-480°F, this material will undergo self-sustaining decomposition with evolution of heat and dense noxious gases.

Extinguishing Media: A thermal decomposition can be extinguished by flooding with copious quantities of water or by isolating the decomposing material and allowing it to be consumed.

Special Firefighting Procedures: Firefighters and others subjected to products of decomposition should wear full protective clothing and self-contained breathing apparatus. Chlorine containing gases with traces of phosgene can be liberated at temperatures in excess of 400°F.

(Fire Protection Information Continued On The Next Page)

FIRE PROTECTION INFORMATION (Continued)

Unusual Fire and Explosion Hazards: Nitrogen trichloride can be generated by reaction of water on ACL under certain conditions of pH, concentration and temperature. See Technical Bulletin IC/WT-104 for further information. The reaction of water with ACL 60 generally does not present an explosion hazard as the rate of nitrogen trichloride formation is very slow.

REACTIVITY DATA

Materials to Avoid: Avoid contact with water on concentrated ACL 60 in the container. Concentrated ACL 60 in the container reacts with water to form hypochlorous acid and cyanuric acid. Also avoid contact with easily oxidizable organic material; ammonia, urea, or similar nitrogen-containing compounds; inorganic reducing compounds; calcium hypochlorite; alkalis.

Hazardous Decomposition Products: Chlorine-containing gases can be produced. Traces of phosgene can be liberated at high temperatures 400°F.

Hazardous Polymerization: Does not occur.

HEALTH EFFECTS SUMMARY

The following information presents both human experience and the results of scientific experiments used by qualified experts to assess the effects of ACL 60 on the health of industrially exposed individuals and to support the Precautionary Statements and Occupational Control Procedures recommended in this document. To avoid misunderstanding, the data provided in this section should be interpreted by individuals trained in evaluation of this type of information.

Human Experience

Dermal contact and inhalation are expected to be the primary routes of occupational exposure to ACL 60 chlorinating composition. ACL 60 is considered to be corrosive to the eyes and skin. Exposure to ACL 60 dust or fumes has been reported to produce eye, nose, throat and respiratory tract irritation.

On contact with moisture ACL 60 readily decomposes to chlorine, hypochlorous acid and cyanuric acid. The tissue damage resulting from contact with ACL 60 is considered to result, in part, from its chlorine and hypochlorous acid decomposition products. Exposure to chlorine gas has been reported to cause burning of the eyes with lacrimation; burning of the nose and mouth with rhinorrhea; and irritation of the linings of the entire respiratory tract with coughing, a choking sensation, substernal pain, vomiting, nausea, headache, dizziness and syncope. The onset of severe respiratory symptoms following exposure to chlorine, including pulmonary edema and pneumonitis, may be delayed.

Toxicological Data

Data from Monsanto studies and from the scientific literature for ACL 60 (sodium dichloroisocyanurate) and the potassium salt of dichloroisocyanurate indicate the following:

ACL 60

Oral LD_{50} (Rat):	700 mg/kg, Slightly Toxic
Dermal LD_{50} (Rabbit):	6,000 mg/kg, Practically Nontoxic
Eye Irritation (Rabbit, 24-hr):	Corrosive
Skin Irritation (Rabbit, 24-hr):	Corrosive
DOT Skin Irritation (Rabbit, 4-hr):	Not Corrosive

(Health Effects Summary Continued On The Next Page)

HEALTH EFFECTS SUMMARY (Continued)

Rats were exposed by inhalation to dust of the dihydrate of ACL 60 at exposure levels of 3.2, 10.4 and 32.8 mg/m³ for 6 hours/day, 5 days/week for 4 weeks. Signs of irritation including lacrimation, salivation and labored breathing were observed at the mid- and high-exposure levels. Decreased body weight and/or liver weights and hematological blood parameter alterations were also noted in the mid- and high-exposure groups. No adverse histopathological effects were observed. The no-effect level is considered to be 3.2 mg/m³.

In an 8-week oral toxicity study, rats were administered ACL 60 dihydrate at 400, 1,200, 4,000 and 8,000 ppm in drinking water (adjusted to pH 7.2 to 7.6). Mortality, clinical signs of toxicity and decreased body weights were observed at or above 4,000 ppm. Drinking water consumption was reduced in all treatment groups. Urine volume and urine creatine were decreased for males at 8,000 ppm. No other adverse urinalysis, hematological, biochemical or gross pathological effects were observed.

Potassium Dichloroisocyanurate

Patch testing of 50 human volunteers with a 5% aqueous solution of the potassium salt of dichloroisoyanurate produced no positive reactions following initial application, any of 15 repeated exposures in the induction phase, or on subsequent challenge 2 weeks later. This material was not considered a sensitizing agent.

Additional Information

Contact of ACL 60 with moisture will produce cyanuric acid and hazardous chlorine gas and hypochlorous acid. A Threshold Limit Value (TLV®) has been established by the American Conference of Governmental Industrial Hygienists for chlorine, please refer to the current edition of the *Documentation of Threshold Limit Values*. For information on cyanuric acid, please refer to the Cyanuric Acid Dry Material Safety Data Sheet.

PHYSICAL DATA

Appearance and Odor:	White crystalline solid; slight chlorine odor
Melting Point:	240-250°C (decomposes)
Loose Bulk Density (lbs./cu. ft.):	57 (granular) 59 (extra granular)
pH (1% solution @ 25°C):	6.0
Solubility @ 25°C:	25 g/100 g H_2O

Note: These physical data are typical values based on material tested but may vary from sample to sample. Typical values should not be construed as a guaranteed analysis of any specific lot or as specification items.

SPILL, LEAK & DISPOSAL INFORMATION

THIS SPILL, LEAK AND DISPOSAL INFORMATION IS APPLICABLE FOR CONCENTRATED ACL.

Emergency Spill and Leak Information: Contain spilled material. Any spillage of ACL should be cleaned up as soon as possible to prevent contamination with foreign material with which it may react. See "Reactivity Data" section of this document.

KEEP SPILLED MATERIAL DRY. If allowed to stand in damp or wet areas, tear-producing vapors may result.

(Spill, Leak & Disposal Information Continued On The Next Page)

SPILL, LEAK & DISPOSAL INFORMATION (Continued)

Emergency Spill and Leak Information (Continued):

Sweep, scoop, or vacuum up all spilled material, contaminated soil, and other contaminated material and place in clean, dry containers for disposal. Complete cleanup on a dry basis if possible. Floor sweeping compounds should not be used in the removal of ACL as fuming, fire or explosion may result. Follow all protective measures indicated in the "Occupational Control Procedures" section of this document.

As currently defined, unneutralized ACL is a *hazardous substance* under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). If 100 pounds or more are released into the environment, it must be reported to the National Response Center (800-424-8802 or 202-426-2675). Since local, state and federal laws may vary, consult your attorney or appropriate regulatory officals for information relating to spill reporting.

Keep unneutralized ACL out of sewers, watersheds and water systems.

Disposal Information:

Waste Disposal:

Dispose of in accordance with all local, state and federal regulations.

As currently defined in Federal Resource Conservation and Recovery Act (RCRA) regulations, ACL 60, when discarded, is a *hazardous waste* exhibiting the characteristics of ignitability (D-001) and reactivity (D-003). See 40 CFR 261.23. Its disposal, therefore, is regulated by Federal RCRA regulations. Consult your attorney or appropriate regulatory officials for information regarding additional state and local waste disposal requirements.

Do not dispose of filled or partially filled containers in a common waste compactor. Contaminants in the compactor such as oil, sawdust, floor-sweeping compound, etc. could cause spontaneous decomposition and fusion of the material at ambient temperatures resulting in rupture of the drum.

If material is *dry*, disposal by incineration is recommended.

Do not transport *wet* material. An alternate method for disposal is by neutralization to a non-oxidizing residue which can then be discarded safely. This procedure should be undertaken only after reviewing the details of the method in Monsanto Technical Bulletin IC/WT-104 on storage and handling of ACL.

Wastes of this pesticide may cause irreversible eye damage and burns to skin and may be dangerous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal:

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Rinse empty container with water, and dispose of in the same manner.

ADDITIONAL COMMENTS

The preparation of concentrated solutions or slurries of ACL 60 chlorinating composition is not recommended.

Environmental Toxicity Information:

96-hr LC_{50} Rainbow Trout:	0.37 ppm, Highly Toxic
96-hr LC_{50} Bluegill Sunfish:	0.43 ppm, Highly Toxic
Oral LD_{50} Mallard Duck:	1,916 mg/kg, Slightly Toxic
8-Day Dietary LC_{50} Mallard Duck:	Greater than 10,000 ppm, Practically Nontoxic
8-Day Dietary LC_{50} Bobwhite Quail:	Greater than 10,000 ppm, Practically Nontoxic

This product is toxic to fish. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with NPDES Permit. For guidance contact the regional office of EPA.

Storage: Retie polyethylene liner after each use and keep container tightly closed. Store in a cool dry place. Do not allow water to get into container. Keep containers off wet floors. Do not contaminate water, food, or feed by storage or disposal.

Refer to Monsanto Technical Bulletin IC/WT-104 for detailed information on handling and storage.

DATE: 11/25/85 **SUPERSEDES:** 11/25/84

MSDS NO.: 002893789

FOR ADDITIONAL NON-EMERGENCY INFORMATION, CONTACT:

MSDS Coordinator
Specialty Chemicals
Monsanto Chemical Company
314-694-1000
(A Unit of Monsanto Co.)

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
1 OUTH BROADWAY, ROOM 7011
L ANGELES, CA 90012
(213) 620-2380

P A-1-d

Mr. Donald L. Green, Technical Director
Grow Group, Inc.
760 S. Vail Ave.
Montebello, CA 90640

Dear Mr. Green:

HAZARDOUS WASTE FACILITY PERMIT VARIANCE - EPA I.D. # CAD 085393080

On September 17, 1988, you applied to the Department for a variance from the Hazardous Waste Facility Permit requirements for on-site treatment of trichloro-s-triazinetrione (TCCA) and Sodium dichloroisocyanurate (SDCC) wastes.

A review of your application indicated the following:

- The above compounds are toxic, ignitable and reactive. (Article 9 and 11, Title 22 CCR).

- The above compounds, when discarded, are RCRA hazardous wastes. (40 CFR 261.23).

Based on the above information the Department has made the following determination:

The treatment proposed is not a simple neutralization system and is very sensitive and can pose a threat to human health or environment. Your request for the variance for the on-site treatment of the above waste is therefore denied.

If you wish to treat the above compounds in your facility you must submit a revised Part A and a complete Operation Plan (OP) for Hazardous Waste Facility Permit.

Enclosed please find a copy of the instructions for preparing Hazardous Waste Treatment/Storage Operation Plan.

If you have any questions in this matter, do not hesitate to call Mike Masoud Eshaghian at (213) 620-2380.

Sincerely,

John A. Hinton, P.E., Chief
Facility Permitting Unit
Region 3 (Los Angeles)
Toxic Substances Control Division

JAH:MME:ms

Enclosure

cc: Caroline Cabias, Chief
Department of Health Services
Hazardous Waste Management
Toxic Substances Control Division
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

Exhibit No. 7

INSPECTION REPORT
Grow Group, Inc.
2425-2501 Malt Avenue
Commerce, CA 90040
(213) 724 6530
CAD085393080

RCRA Non-Major Compliance Inspection

Follow-up Inspection

Inspected by: Roy Thielking and Rick Jones

Date of Initial Inspection: June 16, 1988

Date of Follow-up Inspection: September 12, 1988

Date of Report: September 30, 1988

I. PURPOSE:

RCRA Non-Major Compliance Inspection

Follow-up Inspection

II. REPRESENTATIVES PRESENT:

A. Grow Group, Inc. (GGI) Representatives:

Kim Marti, Plant Manager (this facility only)

Donald L. Green, Director of Research and Development, GGI's Consumer and Professional Product Division, 760 South Vail Avenue, Montebello, CA

B. Department of Health Services, Toxic Substances Control Division (DHS/TSCD) Representatives:

Roy Thielking, Associate Waste Management Engineer

Rick Jones, Hazardous Materials Specialist

David M. Chase, Senior Waste Management Engineer

Jim Marxen, Public Information Officer

OWNER/OPERATOR:

An EPA Form 8700-12 filed with USEPA Region IX on September 9, 1986, stated that the legal owners of the facility were as follows:

Grow Group, Inc. (a New York corporation)
200 Park Avenue
New York, NY 10166

Kilsby Tube Supply Company (a California corporation, which on October
9500 Telstar Avenue 1, 1986, was merged into C.A. Roberts Co.,
El Monte, CA 91731 dba Kilsby-Roberts Co., an Illinois
corporation)

Goodyear Tire and Rubber Company (an Ohio corporation)
1144 East Market Street
Akron, OH 44316

During DHS' June 16, 1988 inspection, Kim Marti stated that the following persons have, or have had, hazardous waste management responsibilities at this facility:

Kim Marti, Plant Manager

Mack Smith, Production Foreman

Marylou Copalongon, Quality Assurance and Environmental
(based at the 760 South Vail Avenue facility)

Cassandra Biron, Safety Director, Quality Control Supervisor

Bob Ermer, former Plant Manager

Dennis B. Sabadin, former Plant Manager, now at Vail Facility

James Mahar, Engineering Manager, GGI

III. FACILITY DESCRIPTION AND BACKGROUND:

GGI, Consumer and Professional Products Division, located at 2425-2501 South Malt Avenue, Commerce, CA, operates a hazardous waste storage and treatment facility for which DHS has not issued an Interim Status Document. This facility has stored reactive and/or ignitable hazardous wastes for longer than 90 days, and treats reactive hazardous wastes prior to discharging the residue to the local sewer system. Pursuant to Title 40, Code of Federal Regulations (40 CFR) Part 262.34, this facility is subject to the requirements of 40 CFR Parts 264 and 265 and the permit requirements of CFR Part 270.

On November 19, 1980, the former owner, Georgia-Pacific Corporation (GPC), filed a Part A, USEPA Form 3610-1, (hereinafter Part A) describing treatment of corrosive wastes (D002) in tanks, and storage of the following hazardous wastes in containers: (See Attachment A.)

U226 (1,1,1,-trichloroethane)	300 lb./yr.
U002 (Acetone)	200 lb./yr.
F001 (Spent halogenated degreaser solvent)	180 lb./yr.
D001 (Ignitable wastes)	30,000 lb./yr.
D003 (Reactive wastes)	800 lb./yr.

A plot plan submitted with that Part A described three underground clarifiers; one with a "pH controller no. 1", which accepted drainage from an

acid storage tank farm, one with a "pH controller no. 2", which accepted wastes from a bulk filling area, and one which accepted waste from both of the above units and discharged to the sewer. In Area "1", just north of the main warehouse and process building, a "16 ft. diameter storage tank, H.W." was shown. A 20 ft. by 40 ft. "Drum Storage Area H.W." is shown on the southwest side of the main building. Process design capacity for storage is described as 3,600 gallons in containers, and 600 gallons in tanks, with a capacity for treatment in tanks of 320 gallons per day.

On May 21, 1984, DHS conducted a compliance evaluation inspection of the facility and found the following violations of 40 CFR (See Attachment B.):

265.73 (b)	No records of inspection of the hazardous waste storage areas.
265.16 (d)	Inadequate personnel training records and/or program.
265.51	No written contingency plan.
265.173	No warning signs posted around the hazardous waste storage areas; stored containers of hazardous waste were not closed.

GPC's June 5, 1984, reply to DHS' Report of Violation (ROV), stated that (See Attachment C.):

1. A hazardous waste inventory log had been implemented.

2. All hazardous waste on the premises had been identified and labeled, and a hazardous waste storage area was being prepared and marked.

3. A 30 day extension was requested for preparation of the contingency plan, and to update personnel records and the training program.

There is no record in the file that the contingency plan or the training records were ever received by DHS.

On July 29, 1985, Michael T. Goldstein, Technical Director, Consumer Products Division, GPC, sent a letter to USEPA Region IX requesting withdrawal of the Part A and that the facility be listed as a generator only, as fully enclosed elementary neutralization with discharge to a POTW was the only hazardous waste treatment utilized. Although the letter refers to an attached drawing showing that the treatment unit was fully enclosed, such drawing is not contained in DHS' files. (See Attachment D.)

On August 16, 1985, USEPA's reply to GPC stated that the State had been awarded Interim Authorization to administer the RCRA program, and EPA had transferred the part A to the State for action.

On February 20, 1986, a fire broke out at the facility, releasing chlorine gas from a drum of stored chlorinator chemical. The fire department extinguished the fire and notified the Los Angeles County Department of Health Services (LACDHS).

On February 22, 1986, LACDHS ordered GPC to remove or treat about 130 drums of chlorinator that posed a continuing threat to health and safety. (See Attachment E.)

Also on February 22, 1986, GPC proposed, in a letter to LACDHS, to mitigate stored calcium hypochlorite by mixing it with diatomaceous earth and then to dissolve the hypochlorite in water, and add sodium sulfite to reduce the hypochlorite. (See Attachment F.)

On February 25, 1986, DHS inspected the facility and found that GPC did not keep a copy of the contingency plan at the facility. Representatives of the company stated that the contingency plan was being completed and approved by company management. It was also noted at that time that used hydraulic oil was placed in an aboveground tank and picked up about once a month to be recycled. (See Attachment R.) (This hazardous waste activity is not described in the Part A, and at the time of the September 12, 1988 inspection, the used hydraulic oil was stored in drums. This would constitute a change in the waste management process, for which there is not in the file any record that GPC or GGI filed the required prior notice of change.

The following day, an explosion occurred in the treatment process equipment, releasing an estimated 6000 gallons of partly reacted waste. Facility personnel contained the spill and returned it to the tank. Memos in the file indicate that LACDHS and the Office of Emergency Services notified DHS by telephone (See Attachment G.), but there is no record in the file to indicate that GPC ever notified DHS (required by telephone within 24 hours, to be followed by a written notice within one week) giving details of the incident and corrective measures, and that the facility contingency plan had been implemented and/or amended.

There is also no record in the file that GPC ever notified DHS or EPA that there had been any change in the processes at this facility, or that GPC had filed any closure plan for the hazardous waste management units described in the Part A.

On July 17, 1986, GGI sent USEPA Region IX a letter notifying them that ownership of this facility would be transferred from GPC to GGI on or about July 28, 1986. (A copy of this notice, which was due to EPA by April 30, 1986, was not received by DHS until September 27, 1988. See Attachment O.)

On July 31, 1986, GPC sent a letter to USEPA that stated "ownership (of this facility) was transferred" from GPC, 133 Peachtree Street (P.O.Box 105605), Atlanta, GA 30348-5605 to GGI, 200 Park Avenue, 49th Floor, New York, NY 10166, on July 31, 1986. (See Attachment H.)

On September 9, 1986, Michael T. Goldstein, then Technical Director, Consumer Products Division, GGI, sent USEPA Region IX a Notification of Hazardous Waste Activity and a letter requesting that the EPA ID number CAD085393080 be transferred from GPC to GGI, and indicating that the facility was a generator only. (See Attachment I.)

There are no documents in the file or entries in the variance tracking log of DHS' Facilities Permitting Unit to indicate that GGI has formally applied for a variance or exemption from TSDF requirements, so as to allow this facility to treat, store, or dispose of hazardous waste without a permit.

The file does not contain any indication that the hazardous waste treatment or storage units described in the Part A have been closed, or that hazardous waste processes at the facility have changed.

On June 16, 1988, DOHS conducted a compliance inspection at this facility, and found six violations of applicable regulations and statutes (See Attachment J.) At that time, Thielking and Osborne had the impression that the GGI facility extended only to the driveway area immediately north of the main building. The plot plan submitted with the Part A indicates that the parking area on the north end of the premises is "Goodyear property", and the Part A does not list Goodyear Tire and Rubber as one of the legal owners. (The September 9, 1986 filing, obtained through DHS' Financial Responsibility Unit on September 16, 1988, does list Goodyear as one of the owners.) Therefore, the steel framed corrugated iron building (north shed) and carton storage area northeast of that driveway was not inspected on June 16, 1988.

On July 28, 1988 the Department sent GGI a Report of Violation and Schedule for Compliance (ROV) related to the above findings. (See Attachment K.)

On August 8, 1988, GGI replied to the ROV. (See Attachment L, which does not include the waste analysis plan and the training plan that GGI sent with the letter.) Review of that response and the accompanying plans is incomplete.

On August 10, 1988, GGI experienced an emergency involving three drums of stored reactive hazardous material (trichloro-S-triazinetrione and/or calcium hypochlorite) that GGI had stored in polyethylene lined fiber drums in the north bay of the north shed, and had intended to recycle or treat and dispose of, according to Kim Marti, plant manager.

On September 2, 1988, the fire department was called in to the facility to deal with an emergency involving eight drums of this same stored hazardous material that GGI had intended to recycle or dispose of. On that occasion, the fire department ordered the evacuation of several thousand people from nearby residential areas. This inspection, besides being a follow-up of the June 16, 1988 inspection, is part of a continuing investigation of GGI by the State and the Los Angeles County Department of Health Services (LACDHS).

On September 17, 1988, GGI sent DHS a request for a variance to allow them to treat and discharge to the sewer chlorinator wastes without a permit. (See Attachment Q.)

IV. WASTE STREAMS AND MANAGEMENT PROCEDURES:

Waste streams include the decanted products from damaged or imperfect containers, and the crushed containers. On June 16, 1988, Marti had told Osborne and me that the crushed containers are transported to a landfill. Spilled or off-spec water soluble products were collected in an aboveground tank. After adding sodium thiosulfate or bisulfite to chemically reduce the

available chlorine, and adjusting the pH, GGI discharged the resulting waste to the sewer.

Marti also said that bottled bleach loses available chlorine slowly, and after about six months, falls below specified limits. Outdated liquid bleach, either from on site or received back from company owned distributors, is decanted into drums or tanks, and stored until it can be worked back into the chlorination process.

Solid or semi-solid hazardous wastes are generated as a result of tableting of granulated solid chlorinator chemicals, which are received in bulk, as granules. After being pressed into tablets, the chlorinator is packed into small boxes for retail sale. Wastes generated include baghouse dusts and the waste resulting from washing out the tableting presses.

There is an oil-water separator next to the railroad, near the north corner of the main warehouse and process building, that is mentioned and identified by a photograph and a note on drawings included in the original Part A submitted by GPC. (See Attachment A.) The exact source of the wastes treated in this unit was not determined during this inspection.

There was also some used hydraulic oil that was stored in drums until it could be transported to a recycling facility. (See Observations, below.)

V. OBSERVATIONS:

About 11:20 a.m. on September 12, 1988, I arrived at the subject facility with Rick Jones and Jim Marxen, employees of the Department. We asked to see Kim Marti, the plant manager. David Chase, Program Manager with the Department, arrived about 11:30. Marti and Donald L. Green, director of research and development for GGI, came out to meet us at about 11:40. We all went into the facility's conference room to discuss the current situation of the facility.

In answer to Rick Jones' opening question concerning recent events at this facility affecting the public health and safety, Marti said approximately the following:

> The hazardous material that caused the incidents was some 460-500 fiber drums of dry chlorinator chemical that had come from broken boxes, and/or floor sweepings, and washout of the tableting presses. Some of it was known to be waste, required to be reduced, neutralized and disposed of to the sewer. Some containers held material that could be sorted/ sieved out and recycled without further treatment. GGI employees started to classify the contents of each drum and repackage or dispose of them as appropriate. On August 10, 1988, three of the drums caught fire and caused a release of fumes off site. GGI increased their efforts to deal with the wastes, some of which were still left over from GPC's operations, although the LACDHS had ordered GPC to remove them in February of 1986. On September 2, 1988, another incident of uncontrolled reaction occurred, involving eight drums. Marti said he was called by the fire department about 1:45 a.m., Saturday, September 3, 1988. Subsequent to that incident, another emergency occurred on

Saturday or Sunday. LACDHS then declared the entire lot of drums to be hazardous waste, and instructed GGI representatives to dispose of all of it, immediately. LACDHS Also instituted a 24 hour a day watch at the facility. Marti said that by the morning of September 10, 1988, the last of the subject drums had been transported as hazardous waste to Appropriate Technology (a permitted storage and treatment facility) in Chula Vista, CA, where it will be neutralized and disposed of. LACDHS then terminated its watch at the facility.

(While we were in the conference room, there had been some discussion between Marti and another employee about a load of drums that just at that moment was leaving for Appropriate Technology. Jones had asked Marti if that load involved the subject wastes from the north shed, and Marti stated that the load just leaving was the last sixteen drums of it.)

We six all went out to view the site in the north shed where the drums of reactive waste had been stored. There was still a residue of sticky looking material, together with a white powder, on the asphalt surface where Marti said the drums had been stacked. (See Attachment M, Photo No. 1.) Reference to the plot plan included with the original Part A, and Photo No. 1, indicates that the wastes that reacted on August 10, 1988, and September 2, 1988, had been stored within 50 feet of the property line, a violation of Title 22, California Code of Regulations (22 Cal. Code Regs.), section 67246.

Marti said GGI employees had spread soda ash over the waste on the shed floor, to try to neutralize it. There were also streaks of white powder in the yard, where Marti said they had set up a temporary treatment system in portable tanks (which operation appears to have been an unpermitted hazardous waste treatment unit), and in another bay of the warehouse shed. (See Attachment M, Photos Nos. 2 & 3.) I asked Marti what the material was. He said it was soda ash, which they had spread to neutralize any possible spills of the waste being treated. I told him that whether it was soda ash or the chlorinator, the material was hazardous waste under California regulations, as it was spilled, and both materials were listed California hazardous wastes. I told Marti that the material must be cleaned up immediately. He then pointed out to me a workman, who was wearing a respirator and sweeping in the yard. Marti said that the workman had been assigned to clean up the residues remaining for disposal. (See Attachment M, Photo No. 4.)

The facility was surrounded by a six-foot cyclone wire fence with gated access openings for vehicular traffic. A gate was open on the side next to Malt Avenue leading into the yard where corrugated boxes are stored at the north end.

There was discharge of cooling water wastes to the paved yard surface from a cooling tower at the north end of the main warehouse and process building, which building occupies the central portion of the property. I asked Marti what kind of additives were in the cooling tower. He said he didn't know, but that he would find out from his process engineer. (We did not happen to see the process engineer during this inspection.) I told Marti that they needed to characterize the waste to be able to say if it wasn't hazardous.

I looked at a portable tank adjacent to the north cooling tower. When I asked Marti what it was, he said it was an oil water separator unit. I asked Marti what the various connections to the unit were for, and which way the portable pump next to it would pump if it were operating. (The pump was connected to the tank, but not operating at that moment.) He said he didn't know, but he would find out from his process engineer. There were streaks of residue on the outside of the separator tank and on the paved yard adjacent to it, as if it had overflowed. There was a curb on the northwest and southwest sides of the tank, which stood next to a sump. Marti said the sump, which appeared to drain a large portion of the yard, was connected to the sewer. (See Attachment M, Photos Nos. 5, 6, & 7.) The separator was connected to the main building, and I asked Marti where the pipes came from. He said he didn't know. (See Attachment M, Photo No. 8.) I told Marti that it appeared as if the tank might be continuously fed, and if that were the case, the tank must be equipped with a high level alarm and cutoff or diversion to another tank.

The waste treatment processes described in the Part A appear to have been changed, in that the location of the hazardous waste treatment tank, shown in Area "1" on the plot drawings and photos, had been moved by about 50 feet; the Part A states the tank is used to treat D002 (corrosive) wastes, but when Jones and I asked about its use, Marti said it was used to separate oil and water. Other units not noted in the Part A include the wastewater treatment plant, and the use of a tank in the south tank farm for storage of off specification bleach.

Jones called to our attention an open drum partly filled with oil, and marked "Waste Only". (The word "Hazardous" preceding "Waste Only" had been spray painted over.) He asked Marti what the oil was from. Marti said he didn't know where it came from. Jones said the drum shouldn't be left uncovered, as it contained California regulated hazardous waste, and it should be appropriately marked and labeled as hazardous waste. (See Attachment M, Photos Nos. 9 & 10.)

Jones and I also observed two open five gallon containers partly filled with a white solid standing beside a large tank near the above mentioned open oil drum. When asked, Marti said he didn't know what the material in them was. (See Attachment M, Photo No. 11.)

Chase and I saw a stack of 30 or more unlabeled and undated drums along the southwest wall of the north shed. We asked Marti what they contained. He said they were full of used hydraulic oil. I told him that since oil is a California regulated waste, they must be labeled as hazardous waste while stored prior to transport. (See Attachment M, Photo No. 12.)

As we all proceeded along the north side of the main building to the rail siding, I noticed there was an oily residue around/under a plastic pipe which ran along the outside of the building next to the ground. I called that to Marti's attention, and told him that even that much of a discharge of hazardous waste must be stopped. (No photo)

We all saw a series of heat exchanger units set up between the siding and the main line past the plant. Only one of the units was operating. (See

Attachment M, Photo No. 13.) Marti said that this unit was used to cool the blow molding equipment inside the building. He said that GGI had begun to modify the piping from the blow molding operation to allow the waste heat to be used to heat the neutralization process. This would promote dissolution of solids and shorten reaction times. DHS has yet to receive the required prior notice that GGI intends to modify their waste treatment process.

We proceeded south along the rail siding to a tank farm located next to the fence. There, Chase and I saw spray paint marks on one of the tanks that may have been left by an intruder. This suggests that security measures at the facility may be inadequate. (See Attachment M, Photo No. 14.) Marti said that only two of the tanks currently contained liquid; one contained glycol from Texaco that has been stored there since before the transfer of ownership from GPC (July 31, 1986). Marti said GGI was trying to return it to Texaco, since GGI doesn't use glycol. This may be storage of retrograde or unusable material for longer than one year without written approval from DHS.

Another tank holds spent bleach prior to neutralization. When we asked which tanks were in use, Marti said he didn't know. (See Attachment M, Photos Nos. 15 & 16.)

Attachment M, Photo No. 15 also shows a dried flow of fine-particle solids that apparently was discharged somehow from the yard area adjacent. Marti said he didn't know what the source of the discharge was. There had been some construction involving placement of concrete recently at this facility, but the residue didn't look as if it contained concrete. Also, adjacent to this discharge, inside the yard, there is a low area and a collection sump. During this inspection, there was a plastic drum in the sump, weighted down with a steel beam. (See Attachment M, Photo No. 17.) There was water covering a portion of the yard, in addition to filling the sump. An air driven pump was connected to the drum, and Marti said it was pumping the water to the wastewater treatment system. (See below.)

Returning north along the back side of the main building, Chase, Jones, and I saw that a portion of the building had been cut away with a power saw, apparently to admit the installation of one or more of the tanks inside. The opening had been closed with a six foot concrete block wall, but mineral residues along some unpatched saw cuts remaining from the opening process, and brown streaks extending from them across the asphalt paving, indicated that there had been releases of fluids which were not retained by the containment. Marti said he did not know what those wastes might have been. (See Attachment M, Photos Nos. 18, 19, & 20.)

Some distance farther along the back of the building, we saw a former doorway had been closed with a wooden structure. (See Attachment M, Photos Nos. 21 & 22, outside, and 23 & 24, inside the building) There appeared to have been a similar pattern of discharge here, as evidenced by the corroded condition of the doorpost protectors, and streaking across the adjacent asphalt. I noticed a pipe just to the left of the doorway that looked as if it may have discharged wastes. I asked Marti where the pipe came from. (See Attachment M, Photo No. 22.) He said he didn't know, and couldn't account for the rusty looking streak extending from it across the asphalt.

All six persons on this tour entered the main building by climbing a short ladder equipped with handrails that led to an open door into an unattended shop/storage area. This provided unchallenged public access to the active portion of the facility. (See Attachment M, Photo No. 22.)

We proceeded through the main building, which houses six or more large cylindrical chemical storage tanks. Two or three acid storage tanks are within a lined containment structure of concrete blocks about six feet high. Three or four other tanks, about fifteen feet high, stood within a containment area that was surrounded by curbing about eight inches high. Marti said these tanks all contained raw materials, but there were leaks from pumps and/or piping within this area, and the concrete of the containment structures was eroded, and hazardous constituents may have been migrating into the ground. The tanks did not contain markings indicating the type of hazardous materials they contain, and there were large rust patches on the sides of the tanks. Marti said the tanks had rece relined inside with fiberglass. (Photos I took of this are .)

We continued past the bottl ting, filling plastic bottles with liqui d was allowed to drip or flow from sever floor, which drains to a clarifier and p , Marti said that water was used to lub it otherwise might be contacted with the tos of this area printed out.

saw materials leaking from pumps and piping possible indicators of release of corrosives to ground

Just east of the southernmost are three tanks within a low containment nt, which Marti said are used to store a sists of washwater and spent bleach or cl able for recycling through the chlorinat t mixed with thiosulfate or sulfite to e e, then pH adjusted before being discharg M, Photos Nos. 25, 26, and 27.)

Around the corner of the main buil the wastewater treatment plant, Jones and I saw that there were two tall cylindrical tanks, unlabeled, surrounded with a containment structure. Marti said these tanks contained liquid caustic, a raw material used in making bleach solution. The floor of the containment was wet and eroded. About an inch of liquid stood in a channel around the perimeter of the inside of the structure. There was a fiberglass reinforced plastic liner over the concrete, but it appeared the liquid had eaten through it in places, and there were signs of seepage from the containment. This may constitute disposal of sodium hydroxide solution.

Toward the front of the yard, next to a storage shed south of the main building, Chase, Jones, and I saw a blue painted steel roll off container which contained empty used bleach bottles. The odor of bleach was readily apparent near this roll off container, which did not contain the required label indicating it had been registered and inspected. It was labeled as belonging to All Service Disposal (213) 721 7089. (See Attachment M, Photos 28, 29, 30, and 31.) I told Marti and Green that the bleach bottles, unless rinsed clean, contained hazardous waste, and they must be placed into a

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We continued past the bottle filling line, which was operating, filling plastic bottles with liquid bleach. Water or other clear liquid was allowed to drip or flow from several places on the equipment onto the floor, which drains to a clarifier and pH controller. When I asked about it, Marti said that water was used to lubricate or clean some components that otherwise might be contacted with the bleach solution and corrode. No photos of this area printed out.

Just east of the southernmost corner of the main building, there are three tanks within a low containment curbing, and one with no containment, which Marti said are used to store and/or neutralize wastewater that consists of washwater and spent bleach or chlorinator solutions that are not suitable for recycling through the chlorination process. The wastewater is first mixed with thiosulfate or sulfite to eliminate reduce the available chlorine, then pH adjusted before being discharged to the sewer. (See Attachment M, Photos Nos. 25, 26, and 27.)

Around the corner of the main building from the wastewater treatment plant, Jones and I saw that there were two tall cylindrical tanks, unlabeled, surrounded with a containment structure. Marti said these tanks contained liquid caustic, a raw material used in making bleach solution. The floor of the containment was wet and eroded. About an inch of liquid stood in a channel around the perimeter of the inside of the structure. There was a fiberglass reinforced plastic liner over the concrete, but it appeared the liquid had eaten through it in places, and there were signs of seepage from the containment. This may constitute disposal of sodium hydroxide solution.

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registered and labeled container before they could be transported to a permitted treatment/disposal facility.

Adjacent to the south tank farm, in an unmarked, unbermed area of the yard, we all saw several stacks of drums and smaller containers. (See Attachment M, Photo No. 32.). Jones asked Marti what was in these containers. Marti replied that they were all empty. Closer perusal of the individual containers disclosed the following:

> About thirty plastic drums, whose tops had been cut off, were partly filled with white friable solids. Labels attached to the drums stated "Top Chlor", and contained the D.O.T. "Corrosive" label. (See Attachment M, Photos Nos. 33, 34, and 35.)
>
> At least six unlabeled open drums had been covered with plastic and taped. The plastic coverings had deteriorated and had holes in them, exposing the contents of the drums to the environment. The wastes within appeared to have the physical consistency of grease. Neither Marti nor Green could identify the contents of the above two lots of drums or tell us how long they had been stored. (See Attachment M, Photos Nos. 36, 37, and 38.)
>
> Several other lots of drums were not labeled, and/or had streaks or residues of wastes on the outside. Some of these drums were empty, others were not. (See Attachment M, Photos Nos. 39, 40, 41, and 42.) None had accumulation dates, and some appeared to have leaked their contents onto their pallets and/or the ground. Some of the full drums displayed GPC labels. Marti said that GGI had not received any supplies from GPC since about the time of the ownership change in 1986. Labels on some of the full drums indicated the contents of one or more drums to be either formaldehyde 37%, or sulfuric acid (either 93% or 33%, depending on which label was the correct one on the same drum), or ammonium thiosulfate solution 60%. The last was two drums from Van Waters and Rogers, serial nos. 036076 and 036214.

We all returned to the conference room for a short wrap up discussion.

VI. POSSIBLE VIOLATIONS:

Count 1: Title 22, California Code of Regulations, section 67103. Security.

> The owner/operator did not prevent the unknowing entry, and minimize the unauthorized entry, of persons or livestock onto the active portion of the facility, in that:
>
> > Vehicular access gates along Malt Avenue and/or between the public parking lot and the active portion of the facility were not kept closed or attended during this inspection.
> >
> > At one point during the walkthrough tour of the facility, Chase, Jones, Marxen, and I, together with Marti and Green, entered the facility from the rail siding area through an open door served by a ladder. This doorway was not guarded or

fitted with an automatic closure or alarm device. (See Attachment M, Photo No. 22, Attachment F.)

The rail car access doors to a rail car parking shed, which shed communicates with the rest of the facility, were poorly fitting, and although they were locked, they permitted access to the facility.

Count 2: 22 Cal. Code Regs., section 67257 (c) and (d). General Operating Requirements for Interim Status Facilities.

Uncovered tanks must be operated to ensure at least 60 centimeters (2 feet) of freeboard...

The oil water separator tank at the north corner of the main building was open, and could be continuously fed, but there was no high level alarm or control device to ensure that the level in the tank stayed at least two feet below the top of the tank. The streaks of residues on the outside of the tank indicated that the tank may have overflowed in the past. (See Attachment M, Photos Nos. 5 - 8.)

The tank at the eastern corner of the main building, although nearly empty at the time of this inspection, appeared as if it had overflowed in the past. Marti acknowledged that it had been used as a hazardous waste storage tank associated with the wastewater treatment system. When I inspected this facility on June 16, 1988, the freeboard was about a foot and a half. (See Attachment M, Photos Nos. 25, 26, & 27, and Attachment N, Photos Nos. 3, 4, & 5.)

Count 3: 22 Cal. Code Regs., section 67243 (a). Management of Containers.

Containers holding hazardous wastes were not kept closed during storage, except when it was necessary to add or remove waste, in that:

An open drum labeled "Waste Only" (The word "Hazardous" had also been painted on the drum, but had been spray painted over), partly full of oil, a California regulated hazardous waste, stood next to a rack of supply oils. There were no employees within sight of it, and no cover for the drum anywhere around it. (See Attachment M, Photos 9 and 10.)

Two pails containing unidentified white solids stood uncovered in the same area as the uncovered oil drum. (See Attachment M, Photo No. 11.) Marti said he didn't know what was in these pails. The white solids usually handled at this facility are either chlorinator or soda ash, both hazardous wastes.

Approximately 30 open plastic drums of white solids, labeled Top Chlor, were stacked in the yard next to the south warehouse. (See Attachment M, Photos Nos. 32, 33, 34, and 35.)

Six or more unlabeled drums covered with plastic that had holes in it, contained undefined solids that appeared to have the consistency of grease, but may have been from processes using chlorinator chemicals. Marti said he didn't know what they were.

Count 4: 22 Cal. Code Regs., section 67246. Special Requirements for Ignitable or Reactive Waste.

It is required that ignitable or reactive waste be stored at least 50 feet from the property line.

The reactive wastes that Marti acknowledged had been stored in the north shed, had been stored within 50 feet of the property line, and had presented an exposure hazard to the property directly behind the shed. (See Attachment M, Photo No. 1.) The chemicals identified as having been stored and been the source of reactions, either in 1986 or 1988, included trichloroisocyanuric acid, sodium dichloroiso cyanurate, and calcium hypochlorite, all of which are listed in the Merck Index, Condensed Chemical Dictionary, and Dangerous Properties of Industrial Materials, as reactive materials.

Chase, Jones, and I saw 30 or more drums of used hydraulic oil, an ignitable waste, stored along the southwest wall of the north shed, less than 50 feet from the property line. (See Attachment M, Photo No. 12.)

Count 5: 22 Cal. Code Regs., section 67247 (c). Special Requirements for Incompatible Wastes.

The drums stacked just north of the south warehouse were labeled as containing sulfuric acid (33% or 93%), Top Chlor, sodium thiosulfate 60%, formaldehyde 37%, and other unlabeled materials/wastes. These incompatible wastes were not separated or protected from one another by any dike, berm, wall, or other device. (See Attachment M, Photos Nos. 32 - 42.)

Count 6: 22 Cal. Code Regs., section 66471. Hazardous Waste Determination Requirement for the Generator.

GGI failed to determine if each waste stored in the yard just north of the south warehouse is listed as a hazardous waste in Article 9 or 11 of 22 Cal. Code of Regs. When Jones, Chase and/or I asked Marti what was in each lot of drums, e.g., the 30 open drums of white solid, or the open drums of greasy looking waste covered with plastic, he said each time, he didn't know, and indicated the company would have to sample and analyze each group to find out.

When I asked Marti what additives GGI uses in the cooling towers, he said he didn't know. He also didn't know what wastes the oil water separator tank treated, or what kind of oil was in the open drum next to these units.

Count 7: 22 Cal. Code Regs., section 67120 (a). Design and Operation of Facility.

This facility was not maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, in that:

The former drum storage area in the north shed had not been cleaned of residues of hazardous waste.

The containment areas around the product storage tanks in the main building were not impervious, as Jones, Chase, and I saw indications that wastes had escaped from them in the past along the back side of the building, where stains and mineral deposits traced the course of past discharges. (See Attachment M, Photos Nos. 17 - 22.) There were discharges of liquid into the containments inside th building, and the concrete was etched to a depth of up to two inches.

The containment around the sodium hydroxide tanks next to the main building contained pooled liquid, and the outside of the containment wall showed residues from seepage of wastes into the yard.

. The drainage sump next to the railroad in the yard south of the main building was allowed overflow into the surrounding yard, where cracks in the pavement allowed percolation of wastes into the ground. (See Attachment M, Photo No. 17.)

The following Violation may be prosecuted civilly or criminally under Health and Safety Code Section 25191.

Count 8: 22 Cal. Code Regs., sections 66504 (a) and (b), and 66508 (c). Packaging, Labeling, Placarding, and Marking Requirements for the Generator.

GGI submitted hazardous waste for transport in a container that did not contain a registration/inspection certification label.

Chase, Jones, and I saw a roll off bin in the yard. This bin was full of drained liquid bleach bottles. The odor of bleach was readily apparent around the bin. There was no hazardous waste transportation registration inspection sticker on the bin. It was apparent that the subject bin contained waste liquid chlorine bleach, a hazardous waste, and that GGI was submitting the waste for transport in violation of the above cited statute and regulations. (See Attachment M, Photos Nos. 28, 29, 30, and 31.)

VII DISCUSSION WITH MANAGEMENT:

We all returned to the conference for a short wrap up discussion. Jones and I told Marti and Green that they must immediately characterize and label all

the containerized hazardous wastes stored in the yard by the south tank farm, and as soon as possible, legally dispose of or recycle all of it. I told Marti and Green that the waste oil water separator tank needed to have a high level alarm/control device on it, and the secondary containment curbing around the wastewater treatment plant was too small to retain the contents of the tanks. the cooling towers, and the tank farms. Chase asked several questions about when the facility managers decided that the materials they were storing were hazardous wastes. Marti and Green stated that some of the material in the drums had been waste all along (floor sweepings, and the wastes generated from washout of the tableting machine, etc.), but that they thought they could salvage the good material out by sorting and/or sieving, and either recycle the rest through the chlorination process, or "neutralize" it and dispose of it to the sewer.

Marti and Green said that they would act on our directions to clean up the hazardous waste storage areas and to characterize and dispose of the containerized wastes.

VIII. LIST OF ATTACHMENTS:

A. November 19, 1980 Part A, submitted to USEPA by GPC.

B. May 21, 1984 Inspection Report and Notice of Violation.

C. GPC's June 5, 1984 reply to NOV.

D. GPC's July 29, 1985 letter requesting generator only status.

E. February 22, 1986 Notice of Violation, from LACDHS

F. GPC's February 22, 1986 letter to LACDHS proposing to treat wastes.

G. February 24 and 26 file memos indicating telephone notification of the February 20 and 22, 1986 incidents.

H. GPC's July 31, 1986 letter notifying USEPA of the transfer of ownership.

I. September 9, 1986 GGI letter and Notification of Hazardous Waste Activity to USEPA Region IX.

J. Report of June 16, 1988 inspection.

K. July 28, 1988 Report of Violation and Schedule for Compliance.

L. August 8, 1988 response letter from Grow Group, Inc.

M. Photos of facility, September 12, 1988.

N. Photos, June 16, 1988. (not returned from finisher before report was completed June 30, 1988)

O. Plot plan showing approximately where photos were taken.

P. GGI's September 23, 1988 letter and attachments.

Q. GGI's September 17, 1988 request for a variance to treat chlorinator wastes without a permit.

R. DHS' Inspection Report and Notice of Violation, February 25, 1986.

Roy Thielking 9-30-88

Roy Thielking
Associate Waste Management Engineer

Date Submitted

9-30-88

David M. Chase
Program Supervisor
Surveillance and Enforcement Unit

Approval Date

March 3, 1989

FOLLOWUP INSPECTION
for
Grow Group, Inc.
2501 Malt Avenue
Commerce, CA 90040

Report prepared by Roy H. Thielking

I. Purpose:

To conduct a followup inspection of this facility.

II. Representatives Present:

A. State inspectors:

Roy H. Thielking, AWME, DHS

Richard Jones, HMS, DHS

B. Facility Representatives:

Jay Lang, Division Vice President

Edward Woodson, Corporate Counsel (by telephone from Los Angeles, the latter part of the walkthrough, and the exit interview)

Kim Marti, Plant Manager

Donald Green, Director of Research and Development

Jim Mahar, Chemical Engineer

Anand Shah, Director of Environmental Affairs

David B. Russell, General Counsel (by telephone from New York)

III. Inspection:

Richard Jones and I arrived at the facility at about 1330 hours. We observed that the gate to the north section of the yard around Building #5 from Malt Avenue was open and unattended. The gate from the employees parking lot, to which the public has access, into the loading dock area north of Building #4 was also open and unattended. The gate into the main yard around Building #4 was open, and a catering truck was parked in the yard. After we noted these conditions, we proceeded to the office and asked to see Marti.

Marti took us to his office, where we were joined by Shah, and a bit later, by Mahar and Green. Jones and I asked about the status of the HWMUs that were identified either on the original Part A application, or on the drawings submitted in 1988. We were told the following:

- o There had been no treatment of solid chlorinator chemicals on site since about 9/15/88.

- o Two oil water separators are still operational - one north of Bldg. #4 processes hydraulic oil and water from the blow molding machines, and one south of Bldg. #2 receives oil and water from the truck shop. Marti said he was not aware of any variance in effect for the separator units.

- o Runoff waste from the bleach bottling line goes to a clarifier, then to a storage tank. Available chlorine is checked; if it is high enough, the liquid is pumped back to the bleach manufacturing process. If it is weak, the waste is checked for compliance with discharge requirements, pH adjusted and diluted if necessary, and discharged to the sewer. No variance has been issued for this treatment unit.

About 1430, Jay Lang telephoned Marti and requested we all go to the plant office for a telephone conference with Russell, who was in New York, and Woodson, who was in Los Angeles. The attorneys stated theyhad heard that the Attorney General intended to pursue civil action against the company and they were concerned that information obtained during the inspection might be used against the company or its employees. Jones said the primary purpose of the inspection was to determine compliance with respect to violations noted in our past ROVs. Woodson stated he would come to the plant so that he could be present during any discussions. We agreed to take the walkthrough first.

About 1550, we began the walkthrough. As we walked toward Building #5, Jones and I mentioned the fact that we had observed the gates open when we arrived. The main gate, card controlled, was shut at this time, but the street gate into the north yard was still open, as was the gate from the employee parking lot into the loading dock area. Green stated that Simpson had told GGI at the 1/13/89 meeting in DHS' offices, that DHS would not require GGI to fulfil all facility interim status requirements if GGI submitted a notice of their intent to close the facility. Since this is a facility requirement, he thought it does not apply.

I observed a depression in the asphalt paving of the yard near a diesel fuel station just north of Building #4. The asphalt was cracked and broken in the depression, and oildry had been placed there as if to soak up spillage. I asked what was there, and was told that there had been an underground gasoline storage tank, which had been removed under the direction of the County Department of Public Works.

At the northeast corner of Building #4 we observed an oily stain/slick surrounding some machinery. We were told that was the power units for the hydraulically operated tableting presses. Jones and I told the facility reps. that the leakage constituted discharge of California HW and they must take action to contain/clean up the oil.

The floor of the north bay of Building #5 had been cleaned. Marti said that Disposal Control Services had scattered soda ash and after leaving

it in contact with the waste a while, they swept it up and spread fresh soda ash, until the visible residue was gone.

The drums of hydraulic oil which had been stored next to the south side of Building #5 have been removed.

The oil water separator tank next to the RR and north of Building #4 was within an area of concrete paved yard that had curbing around it. An overflow of water was flowing from a pipe that was connected near the bottom of the tank and slanted upward to maintain the liquid level in the tank at about two feet of freeboard. Plant reps said this tank was for treating runoff from around the blow molding machines. They said the sump the overflow water went into was connected to the sewer. Mahar and Shah didn't seem to be sure just how the drains run, however. They said GGI plans to change the drains to ensure this wastewater goes through the treatment plant. Jones informed GGI reps. the oil water separators would need to be covered by a variance in order for the facility to qualify for generator status. This tank was not marked with Hazardous Waste signs.

The area west of Building #4 was cleaner than it was on 9/12/88, with less staining and mineral residues on the ground surface. This could have been due to the rains that happened since then.

The tank farm north of Building #2 - the ethylene glycol that had been stored there has been sold as product. Also the phosphoric acid. Marti and Mahar said there may be other materials still stored there, but they did not knoww off hand what they were, or which tank(s) they were in.

Facility reps. said the empty drums north of Building #2 were analyzed, and some were shipped off site as HW. Jones requested copies of the analyses and manifests.

The oil water separator at the south side of Building #2 consists of two tanks without secondary containment. Mahar said that the oil phase is taken by The Sump Doctor. He indicated it had been shipped twice in the last year. He said sometimes GGI pays for the removal; other times GGI is paid for the oil, depending on market conditions. Either way, GGI gets a receipt, and DHS requested copies, to check frequency of removal. These tanks also were not labeled with HW warnings.

We asked if GGI had copies of other environmental permits, such as the CSDLAC industrial waste discharge permit. Mahar said CSDLAC had just issued them a permit. Jones requested they send DHS copies of both the new permit and the old one, which Mahar said expired upon the transfer of ownership in 1986.

We asked about the hydraulic oil that had been stored next to Building # 5. Shah said that those drums had been moved to an area near the maintenance shop, where used compressor oil is stored, and that it has not been removed from the property. The subject drums were not actually inspected.

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The oil water separator tank next to the ... #4 was within an area of concrete paved yard ... An overflow of water was flowing from a ... the bottom of the tank and slanted upw... ...n the tank at about two feet of free... for treating runoff from around the sump the overflow water wen... and Shah didn't seem to be su... said GGI plans to change ... through the treatment plant. separators would need to be co... facility to qualify for generator s... ...ch Hazardous Waste signs.

Moved waste oil from shed located along south wall of Building 5 to South of Building 2

The area west of Building #4 was cleaner ...d, with less staining and mineral residues on the ... ...his could have been due to the rains that happened since

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Grow Group, Inc. CAD 085393080 3/3/89

Exit conference:

I reminded Mahar and Green that the clarifiers described in the original Part A must be included in any closure plan submitted to DHS.

We requested information on the periods of operation of the trichlor treatment tank.

We told GGI reps. that the company must submit a written estimate of closure costs and financial assurance for such costs with their closure plan.

We requested a written record of how wastes are characterized.

We requested a copy of the training records of employees engaged in HW management.

We told the facility reps. that we would confirm all requests in writing, and advise them of the compliance status of the violations that had been cited in our ROVs.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

MAR 27 1989

Mr. David B. Russell
Grow Group, Inc.
Pan Am Building
200 Park Avenue
New York, NY 10166

Dear Mr. Russell:

The Department has reviewed your February 2, 1989 letter and has the following comments:

Your statement of "notification to begin closure" of your City of Commerce facility is not sufficient to relieve Grow Group, Inc. (GGI) from interim status facility requirements. Please be advised that the facility remains a RCRA regulated interim status treatment and storage facility. It is therefore subject to continuing daily violations for noncompliance with interim status facility requirements until the activities and/or documents listed below are reviewed and approved by the Department. However, the Department may determine that your February 2, 1989 letter gives sufficient notification to stop the counting of certain continuing daily violations.

GGI is directed to submit to the Department for review, by April 30, 1989, a time schedule for completing and/or submitting at least the following:

- A closure plan describing how GGI will fully comply with all applicable requirements of Title 22, Cal. Code Regs., Article 23, and addressing all storage and/or treatment or disposal activities and units that have taken place at the facility during its active life. The Department's November 15, 1988 Report of Violations, Counts 1 and 4, identifies several units of which the Department is aware were operated, and closure of which must be addressed. If GGI is aware of any other historical hazardous waste management units at this facility, they must also be addressed in the closure plan, or documentation furnished to assure that they have been closed in accordance with applicable regulations.

- Pursuant to Title 22, Cal. Code Regs., Article 17 (Section 67001 et seq.), a written estimate of the expected cost of closing the facility, and the necessary original documents to provide adequate assurance of financial responsibility to complete the proposed closure activities. Such estimate and financial responsibility assurance shall be submitted to Rubia Bertram, Chief, Financial Responsibility Unit, Department of Health Services, Toxic Substances Control Division, P.O. Box 942732, Sacramento, CA 94234-7320.

MAR 27 1989

- A written inspection schedule and plan that ensures compliance with Title 22, Cal. Code Regs., Article 24, for storage of hazardous wastes in Building #3 and the drum storage of used oil near the truck shop, and Article 25, except for Section 67258, for operation of the oil water separator units and the wastewater treatment unit. Such inspection plan must also ensure that all hazardous waste containers and tanks are labeled or marked in accordance with Section 66508(a)(2)&(3) and (c) of Article 6.

- Installation of an internal communication system and/or outside telephone available at the scene of operations which is capable of summoning emergency assistance or providing instructions to facility personnel, as required by Title 22, Cal. Code Regs., Section 67121 (a) and (b).

- A contingency plan and emergency procedures in accordance with Title 22, Cal. Code Regs., Article 20.

- A training plan that complies with the requirements of Title 22, Cal. Code Regs. Section 67105.

Please address the subject documents, except for the financial responsibility requirements, to John Hinton, Chief, Facilities Permitting Unit, with a copy to the undersigned, at the above address.

During the March 3, 1989 inspection of the facility by the Department, GGI representatives acknowledged that there are two oil water separator units and a waste liquid bleach neutralization unit currently in operation. Please be advised that these units are subject to California regulations as hazardous waste treatment units. The Department may allow GGI to continue to operate these units, if it complies with the following:

(1) The facility complies with all interim status regulations. The facility needs to receive a variance or permit from the Department.

(2) The facility immediately takes action to furnish each operating unit with interim status containment/spill prevention controls specified by Title 22, Cal. Code Regs., Section 67257.

(3) The facility files a revised Part A permit application form identifying current hazardous waste management units.

Please be advised that it is still an option for GGI to apply for a permit to operate a hazardous waste treatment and/or storage facility. Upon Department approval of a completed permit application and verification of GGI's compliance with permit requirements by a site inspection, and public

hearings, the Department may issue a hazardous waste facility permit. This would allow GGI to treat the solid trichlor wastes on site subject to adequate provisions in an approved operation plan. Issuance of a permit would preempt any prior variances. We have attached the necessary forms and instructions to enable GGI to apply for either a variance or a permit.

If you have questions about the preparation of the closure plan or variance, please call Mike Eshaghian, Facilities Permitting Unit, at (818) 567-3118. Address the completed variance/permit applications to John Hinton.

You are also required to furnish to Rubia Bertram the documents necessary to satisfy the applicable public liability financial responsibility requirements, related to sudden and nonsudden releases of hazardous wastes or hazardous waste constituents to the environment, contained in Title 22, Cal. Code Regs., Article 17, for a hazardous waste treatment and storage facility.

If you have questions about the financial responsibility requirements, please call Richard Castle, (916) 324-2431.

Upon the Department's receipt of GGI's certification of termination of treatment or storage in a particular hazardous waste management unit, and verification by on site inspection by Department representatives, GGI will be relieved from the related inspection requirements, and upon final closure of the unit, with Department verification, GGI will be relieved from the security and posting requirements related to said unit(s).

Upon the Department's approval of the closure plan and time schedule for implementation, and finding that submitted documents satisfy the financial responsibility requirements for closure, the Department may waive in writing certain interim status requirements. Until GGI obtains written waivers, however, it must comply with all interim status requirements.

Any acknowledgement of current compliance or termination of responsibilities due to actions by GGI does not preclude the Department from pursuing legal and administrative actions with respect to past violations at this facility.

You are directed to include with all reports the certification exactly as worded in Title 22, Cal. Code Regs., Section 66373 (d), signed by a responsible corporate officer pursuant to Section 66373 (a) and (b).

If you have any questions, please call Roy H. Thielking at (818) 567-3041.

Sincerely,

Scott Simpson

Scott Simpson, Program Supervisor
Surveillance and Enforcement Unit

Enclosures

SS:RT:rt

cc: Rich Sherwood
Toxics Legal Office
Toxic Substances Control Division
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Antoinette Cordero
Gail Ruderman Feuer
Office of the Attorney General
3580 Wilshire Blvd.
Los Angeles, CA 90069

John Hinton, Chief
Facilities Permitting Unit
Toxic Substances Control Division
1405 N. San Fernando Blvd. #300
Burbank, CA 91504

Rubia Bertram, Chief
Financial Responsibility Unit
Toxic Substances Control Division
400 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Bill Carter
Deputy District Attorney
Los Angeles County
Environmental Crimes/OSHA Enforcement
320 West Temple Street
Los Angeles, CA 90012

MAR 27 1989

cc: Edwin V. Woodsome
Munger, Tolles & Olsen
385 South Grand Avenue
Thirty Fifth Floor
Los Angeles, CA 90071-1560

William Jones
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 South Grand Avenue
Los Angeles, CA 90007

Certified Mail
P-565 319 428
Return Receipt Requested

APPLICATION FOR HAZARDOUS WASTE FACILITY PERMIT VARIANCE

California State Department of Health Services
Toxic Substances Control Division

Complete this application and submit it along with the information identified in the attached Supporting Documentation for Variance Application to the:

California Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7011
Los Angeles, CA 90012

I. The facility is owned /operated by Grow Group, Inc. (GGI)

200 Park Avenue, 49th Floor, New York, NY 10166

and is located at

2501 Malt Avenue, City of Commerce, CA 90040.

The facility is operating under Interim Status Document

NA /EPA ID# CAD085393080.

II. Identify below all hazardous waste management operations at the facility. (Check all applicable items).

A. Container Storage

(x) Onsite storage less than 90 Days.
( ) Onsite storage more than 90 days. (Maximum one year)
( ) Onsite storage of small quantities more than 90-days. (Maximum one year).

B. Tank Storage

(x) Above ground tank ( ) Underground tank
( ) Tank located within a vault
(x) Onsite storage less than 90 days (total tank contents must be emptied)
( ) Onsite storage more than 90 days (Maximum one year)

C. Treatment System

(x) System located above ground
( ) System located underground
(x) Elementary neutralization unit
( ) Totally enclosed treatment facility

(X) Wastewater pretreatment unit
( ) Physical, chemical or biological treatment prior to disposal
( ) Other (Specify)_____.

III. Identify the operation for which you are requesting a variance and reasons for request.

Variances are being requested for: 1) elementary neutralization of acids and bases; 2) oil and water separation; and 3) storage of hazardous waste in tanks on site in quantities greater than 5,000 gallons.

GGI requests these variances for operation as a hazardous waste generator only.

A principal executive officer for a corporation, general partner or proprietor for a partnership and a principal executive officer for a public agency must certify the following:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

L. W. WILDE
(Name and Signature)

President, Consumer & Professional Products Group
(Title)

Donald L. Green
(Contact Person)

June 1, 1989
(Date)

Grow Group, Inc.
(Company or Applicant)

2501 Malt Avenue
Commerce, CA
(Mailing Address)

(213) 724-6530
(Telephone Number)

GROW GROUP, INC. COMMERCE FACILITY

VARIANCE SUPPORTING DOCUMENTATION

General Information

Type of Facility: The GGI Consumer and Professional Products Division manufactures professional/household cleaning and sanitation products (See Diagram 1 for site location). These products include bleach and swimming pool maintenance chemicals. Hazardous wastes produced at the site include liquids and residual dust from product packaging. All hazardous wastes are either handled on site and disposed into the industrial sewage system, or transported off site for recycle/disposal at an approved facility.

Waste Storage Time: All hazardous wastes are stored on-site for less than 90 days from first date of accumulation. All hazardous waste containers and waste oil/water storage tanks are labeled as required by 22 CCR Section 66508. Oil/water wastes stored in on site tanks, in addition to all containerized hazardous wastes, are manifested, transported and disposed at an approved facility. The oil/water waste tanks are relabelled following unloading of the accumulated materials. Hazardous waste area inspection forms have been developed to assure disposal of all accumulated wastes prior to 90 days.

Operational Procedures: A site emergency and contingency plan has been developed to regulate and control exposure and release of hazardous wastes to employees, the community, and environment.

This plan is currently being revised per directions of D.O.H.S.

Site Zoning: The facility and bordering facilities consist of industrial manufacturing businesses. The industrial manufacturing zoning code is M-2. The entire facility is covered by paved concrete or asphalt building foundations, parking and driving areas. The facility is accessible for normal traffic to the east only (Malt Avenue).

VARIANCE #1

Elementary Neutralization of Sodium Hypochlorite

Facility Design: Waste Treatment Tank #23
Waste Storage Tank #24

a) **Age:** #23 = 8 years old

#24 = 8 years old

Type: #23 is cylindrical upright - partially opened top (man hole)

#24 is cylindrical upright - open top

Sizes: #23 = 6,000 gallons

#24 = 2,000 gallons

b) **Construction Materials:**

Tanks: #23 = Polypropylene

#24 = Polypropylene

Pipes & fittings: PVC

Containment slabs: Concrete

Containment dikes: Concrete

c) **Secondary Containment Design:** (See Diagram 2)

Surrounding tank #23 & 24 is a contiguous curbing six inches in height to three sides with a concrete block wall to the other side. This structure is designed to collect residual or small quantity leaks/spills from the tanks and associated piping. The collection capacity is approximately 1650 gallons of liquid. Surface liquids are directed to a small sump in the south corner. Any collected liquids are pumped from the sump into the treatment tanks.

Surrounding the above structure and tank #23 & #24 is a secondary containment slab capable of collecting 16,000 gallons of liquid. A depression along the center of the slab directs the flow of liquids. The containment

capacity was determined by metering water to the structure. Any collected liquids are sump pumped to the wastewater treatment tanks.

d) **Waste Unit Location:** (See Diagram 2)

The waste water tanks are located 110 feet from the nearest property line.

Waste Characterization:

a) **Waste:** Sodium hypochlorite solution (NaOCl) - less than 1%

b) **Properties:** Article 9, 22 CCR lists NaOCl as a toxic, ignitable and reactive material.These properties are associated with anhydrous NaOCl. In solution, this material exhibits corrosive characteristics only and is extremely stable.

c) **Chemical Compatibility:** Sodium hypochlorite solution in concentrations less than 17% are compatible with the polypropylene tank. Permeation loss into the walls of the tank will normally not occur.

d) **Quantities:** Approximately 152,750 gallons per month of weak washwaters are produced from bleach production areas. (Source: inventory records)

4) **Waste Source and Process Flow:**

a) NaOCl washwater is produced from: 1) the mechanical pump which transfers NaOCl from the indoor storage tanks; 2) bleach making machines; and 3) bottle filling lines. Any leakage from operation of the NaOCl mechanical pump is collected in the floor drain. Any residual NaOCl washwater produced during bottle filling or bleach making is rinsed and directed to floor drains using pressurized water. Liquids from the drain pipes flow to a 3400 gallon outdoor sump directly in front of and east of building 4C. As the sump fills liquids are pumped into holding tank #24.

Note: The current sump is scheduled for removal and replacement with a 200 gallon transfer tank and surge pump (See Diagram 2 for further details).

A sample is collected from tank #24 and tested for clarity, pH and hypochlorite content. Upon test results, one of three processes will be implemented: 1) the liquids will be recycled; 2) the liquids will be discharged to the sewer; or 3) the liquids will be pH adjusted prior to sewer discharge. If the liquid is deemed of sufficient quality for recycle (greater than 1% NaOCl and relatively free of debris) it is pumped to recycle tank #22. If not, then it is pumped to tank #23. Once tank #23 is three quarters full, the washwater is retested. If only the pH requires adjustment, the batch liquids are neutralized in tank #23 with muriatic acid (approximately 5% concentration) from tank #2. The acid is added to the solution, mixed and aerated during treatment. The liquid is then retested until deemed suitable for discharge to the sewer. If the hypochlorite concentration requires adjustment, water is added to tank #23. One approximately 5,000 gallon batch is normally processed per day and discharged at a rate of about 100 gallons per minute maximum (See diagram 2 for a process flow chart).

The quality of water discharged to the sewer by GGI is regulated by the Los Angeles County Sanitation District (LACSD). GGI has obtained a permit (#11453) from the LACSD for sewer discharge (attachment A). This permit describes the ongoing compliance standards which must be met. All requirements specified in this permit are being implemented.

VARIANCE #2

Elementary Neutralization of Caustic Waste

Facility Design: Waste Storage Tank #25

a) **Age:** 8 years

Type: Cylindrical upright on four stilt legs - open top, cone bottom

Size: 2000 gallon capacity

b) **Construction Materials:**

Tanks #25: Steel, welded joints

Containment slab and dikes: Same as Variance #1

c) **Secondary Containment Design:** (See Diagram 2) Tank #25 is located adjacent to tanks # 23 and 24 and within the same containment area (See Variance #1).

d) **Waste Unit Location:** The wastewater tank is located 110 feet from the nearest property line.

Waste Characterization:

a) **Waste:** Sodium hydroxide tank bottoms

b) **Properties:** Article 9, 22 CCR lists caustic sludge and wastewaters as corrosive material. Sample test results found the pH of this material to be greater than 14.

c) **Waste:** Sodium Hydroxide is compatible with steel. Permeation of this material into the tank walls may occur, but will not result in a product loss.

d) **Quantity:** 350 gallons of the sodium hydroxide waste are produced per month (Source: inventory records).

Waste Source and Process Flow:

Sodium hydroxide waste is produced when tanks #20 and #21 are cleaned out. Bottom sludge remaining in tanks #20 and #21 is pumped to either tank #25 for storage or directly to tank #23 for neutralization. The material in tank #25 is tested for pH and adjusted using muriatic acid from tank #2. During treatment the solution is mixed and aerated. When the pH is confirmed to be below 11, after retesting, a manual valve is opened to allow discharge to the sewer system. The quality of water discharged to the sewer is regulated by the LACSD as described in attachment A.

VARIANCE #3

Oil/Water Separation

Facility Design: Oil/water separation tank, building 4B

a) **Age:** 4 years old

Type: Cylindrical upright, open top.

Size: 1000 gallon liquid capacity

b) **Construction Materials:**

Tank: Polypropylene

Containment: Concrete

Containment dike: Concrete

c) **Secondary Containment Design:**

The secondary containment structure surrounding the separator consists of a concrete flocr slab and a contiguous concrete curbing eight inches in height to three sides and an elevated ramp to the fourth. The area is 1560 square feet in size and capable of containing in excess of 5,000-gallons of liquid. A floor sump is located immediately adjacent (west) of the tank.

d) **Waste Unit location: (See Diagram 2)**

The oil/water separator tank is located 4 feet from the nearest fence line.

Waste Characterization:

a) **Waste:** Hydraulic oil and water

b) **Properties:** Article 9, 22 CCR lists oil/water as a toxic material. The oil phase is drummed for disposal and handled as a hazardous waste. The water phase has been tested for toxic effects and found to be characterized as non-toxic.

c) **Chemical Compatibility:** Hydraulic oils are compatible with polypropylene tanks. Oils may be absorbed into the walls of the tank but will not result in a loss of product.

d) **Quantities:** Approximately 100 gallons of waste oil is produced monthly.

Waste Source & Process Flow:

Waste hydraulic fluids are produced from leakage of the blow mold machines inside building 4C. Oil is collected in troughs surrounding each machine. The troughs are connected to subsurface drain pipes which direct the oils to a sump #1 which is outdoors and adjacent to the oil/water separator. The oil is manually pumped from sump #1 to the oil/water separator tank. Water collected in a sump #3 located adjacent to the water tower is also manually pumped into the oil/water tank.

The oil and water naturally separate due to density differences. After separation has occurred, the water phase is drained into sump #2 (located adjacent to the oil/water tank). From sump #2 the water phase is manually pumped via a sewer connection to the wastewater treatment process east of building 4B. Within 90 days from initial accumulation, the oil is transported offsite for recycling/disposal.

The quality of water discharged to the sewer system is regulated by the LACSD as described in attachment A.

VARIANCE #4

Oil/Water Separation

Facility Design: Oil/water separation tank, building 2B

a) **Age:** 8 years

Type: Cylindrical upright, open top - hinged lid, supported on four stilt legs.

Size: 1000 gallon liquid capacity

b) **Construction Materials:**

Tank: Steel

Containment: Polyolefin tank (Proposed)

c) **Secondary Containment Design:**

No secondary containment structure currently exists.

The proposed secondary containment structure will consist of a circular polyolefin tank which will lay underneath the steel tank. A sump pump will be placed in the bottom of the tank in the case of a spill or leak. Collected liquids will be pumped into the separator tank or 55-gallon drums in the event of a tank leak.

d) **Waste Unit location: (See Diagram 2)**

The oil/water separator tank is located 35 feet from the nearest property line.

Waste Characterization:

a) **Waste:** Crank case motor, hydraulic and diesel oil.

b) **Properties:** Article 9, 22 CCR lists oil and water as a toxic material. The oil phase is considered a California hazardous waste and handled as such. The water phase has

been sampled and analyzed for toxicity characteristics. Results of the test found the liquid to be non-toxic.

c) **Chemical Compatibility:** Steel is chemically compatible with oils. The tank is externally painted to deter corrosion.

d) **Quantities:** Approximately 100 gallons of waste oil are produced monthly.

Waste Source Process Flow:

Waste oils are produced as a result of truck maintenance activities. Oils are drained from vehicles into a holding pan inside the truck shop, then pumped to the outdoor steel separator tank. Transfer of oil is performed by a air pump via a permanently installed piping system.

Oil and any residual waters naturally separate due to density differences. After separation has occurred, the water phase (if any) is pumped to a 1500 gallon adjacent tank. Once this holding tank is full, the water is manually pumped into 55 gallon drums which are transferred and added to the treatment tank east of building 4B. Within a 90 day period from initial accumulation date the oil is transported off site for recycling or disposal.

The quality of water added to the treatment system is regulated by the LACSD as described in attachment A.

VARIANCE #5

Elementary Neutralization of Muriatic Acid

Design: Waste storage tank #2

a) **Age:** 4 years

Type: Cylindrical upright, closed top, cone bottom with tank basket and stands.

Size: 2000 gallon liquid capacity

b) **Construction Materials:**

Tank: Polyolefin

Containment slab: Concrete

Containment dike: Cinder block walls

c) **Secondary Containment Design:**

The secondary containment consists of a six feet high concrete block wall to all sides having a storage capacity of approximately 7000 gallons.

d) **Waste Unit location: (See Diagram 2)** The waste acid tank is located indoors and approximately 12 feet from the back wall of the building.

Waste Characterization:

a) **Waste:** Hydrochloric acid - less than 5% in solution.

b) **Properties:** Article 9, 22 CCR lists hydrochloric acid as an extremely hazardous waste which is a toxic, corrosive and reactive. These properties are associated with anhydrous or concentrated forms. Hydrochloric acid waste produced at the site is an aqueous solution having concentrations of less than five percent. At this aqueous concentration hydrochloric acid has an approximate LD 50 of 14,000 mg/kg (oral) as calculated from a known LD 50 value for a 33% solution. Since a waste must

exhibit an LD 50 of 5,000 mg/kg or less to be toxic, this solution is not considered a toxic waste. Reactive properties exhibited by the anhydrous and commercially concentrated solutions (ie. thirty eight percent solution) are not prevalent in a 5% solution. The acid is, however, still considered a corrosive waste and handled as such.

c) **Chemical Compatibility:** Hydrochloric acid is compatible with polyolefin tanks. Permeation loss of material into the walls will normally not occur.

d) **Quantities:** Of approximately 2000 gallons of hydrochloric acid washwaters produced monthly, 80 to 90% is used for neutralization of bleach and 10 to 20% for neutralization of caustic.
(Source: Inventory records).

Waste Source & Process Flow:

a) Hydrochloric acid waste is produced from bottle filling operations. Acid wash is collected by a floor sump in the acid bottle filling room. The room floor is covered by fiberglass for corrosion prevention. The room floor is periodically washed with pressurized water and the collected liquids pumped into tank #2 for storage.

When needed, the acid waste is pumped to treatment tank #23 for neutralization purposes. The liquid is pumped through an overhead piping system as provided in Diagram 2. Manual and automatic piping vales are provided at the pumping system adjacent to tank #23 for process flow control.

VARIANCE #6

Storage of More than 5000 Gallons
of Hazardous Waste in Tanks at Any One Time

General: Six above ground tanks are used to store hazardous wastes. The tank locations and storage capacities are as follows:

1) Waste motor vehicle oils, building 2A - 1000 gallon capacity.

2) Waste sodium hypochlorite, building 4C - 6000 gallon capacity.

3) Waste sodium hypochlorite, building 4C - 2000 gallon capacity.

4) Waste muriatic acid, building 4C - 2000 gallon capacity.

5) Waste sodium hydroxide tank bottoms, building 4C - 2000 gallon capacity.

6) Waste hydraulic oil, building 4B - 1000 gallon capacity.

Disposition of Wastes: Wastes listed in 1 and 6 above are transported off-site for recycling. These materials are disposed when the storage tanks become full, or within 90 days of initial accumulation, whichever comes first. Wastes listed in 2,3,4 and 5 above are pumped into tank #23 prior to discharge to the industrial sewage system.

Tanks listed in 1,5 and 6 above are labelled with D.O.T. Hazardous Waste labels which signify the waste products, waste characteristics and accumulation dates. Tanks listed in 2,3 and 4 above are part of the wastewater treatment process. These tanks receive and discharge liquids on a daily basis and therefore cannot be labelled or relabelled to accurately reflect accumulation dates.

GROW GROUP, INC. - C&PP GROUP
COMMERCE, CALIFORNIA
HAZARDOUS WASTE STORAGE TANK INSPECTION

Daily Inspection Checklist
Date: _____ Time: _____am or pm Inspection Area: OIL/WATER SEP. - BLOWMOLDING AREA

Inspection	Equipment	Problem	No Problem	If Problem: Reason & Corrective Action
CHECK FOR LEAKS OR OVERFLOW	ACCESS HATCHES			
	VENT SYSTEM			
	VALVE GASKETS & SEALS			
	PIPES & FITTINGS			
	FEED CUTOFFS,BYPASS&DRAINAGE SYSTEMS			
HATCH SECURING	CHECK FOR DAMAGE			
	CHECK SECURING MECHANISM			
VENT SYSTEM	CHECK FOR BLOCKAGE	NOT APPLICABLE		
	CHECK FOR DAMAGE	NOT APPLICABLE		
LEVEL INDICATOR	CHECK FOR OPERABILITY&MATERIAL LEVEL			

Weekly (Monday or first day of the week).

Inspection	Equipment	Problem	No Problem	If Problem: Reason & Corrective Action
STORAGE TANK	CHECK FOR CRACKS,LEAKS,WELD DEFECTS DISCOLORATION			
PIPES&VALVING	CHECK HANDLES FOR OBVIOUS DEFORMATION, CORROSION, DAMAGE, OR OPERABILITY			
CONTAINMENT AREA	CHECK STRUCTURAL INTEGRITY CRACKS EROSION,SPILLING,WET SPOTS, AND SETTLEMENT			

COMMENTS: _____

Inspected By: _____
Name

_____
Signature

cc: J. Meyer
M. Capalongan
J. Lang

.oc tion: 2501 Malt Aven
Commerce 90040

[ ] Severe
[ ] Moderate
[ ] Low Level
[ ] Non-Hazardous

Complaint: [2] A toxic cloud of chlorine gas is coming from a commercial establishment. The cloud is 1/4 mile in length.

Date of Incident: 08/10/88 Time Report Recorded: 18:33 Time Occurred: 18:00
Reported By: Operator #999 Agency: LACFD Phone: 213-267-
LACHD arrival on scene Date: 08/10/88 Time: 19:05
Findings: [6] A 30 gal.container of dry chlorine was undergoing a violent exothermic chemical reaction that generated large amounts of chlorinated gas.

========== Incident Information ==========

Materials/Quantity: Trichloroisocyanuric Acid - 30 to 100 pounds.
Nature of Material: [6] Toxic, corrosive, reactive
Effect: Environmental [4] Community Health [1]
Risk Exposure: [ ] Low [ ] Mod [ ] High Legal Action: [ ] LACHD [ ] LAC
# of Persons Exposed: 0 Symptoms: None reported
(LAC employees Exposed: 0 Symptoms: None reported

========== Remedy ==========

Action: The contents of the drum were spread on the ground, neutralized with soda ash and the material was returned to an on site treatment system.
Clean up company: Disp Control Service Paid By: Grow Group, Inc.
Started Date: 08/10/88 Time: 21:52 Finished Date: 08/11/88 Time: 20:00
Estimated Cost to LAC: 2000.00 Site Secured Date: 08/11/88 Time: 02:02

========== Responsible Party ==========

Officer: Kim Marti, Grow Group Inc., (213)724-6530
Address: 2501 Malt Avenue , Commerce 90040

==========

Agencies Contacted: AQMD (Air Quantity Management District)
Responding Agencies: LACFD (Gibbs), LACSD (Williams), AQMD (Papka), LACHD (Cervantes and Molleda)
Add(ional Information: Airborne emissions were monitored by AQMD and a notice of violation was issued to the responsible party.

HAZARD[illegible] MATERIALS INCIDENT R[illegible] T

DATE: Aug. 10, 1988 TIME OUT: [illegible]07 AT SCENE: 1835 AVAL: [illegible]00 HAZMAT INC. #: 73

CHIEF: Brown ENG. CO.: 50 HAZMAT SQ: 87 ADD. UNITS: HM 105, L 103, MA 11

INCIDENT LOCATION: 2425 Malt Ave., Commerce

RESPONSIBLE PARTY: Grow Group

ADDRESS: Same

COMPANY REP: Plant Mgr., name unknown

TYPE INCIDENT
SPILL ☐ FIRE ☒
LEAK ☐ STORED ☒
DUMP ☐ OTHER ____

	MATERIAL NAME	DOT #	SLD	LQD	GAS	TLV PPM	AMOUNT	PH	FLASH POINT	BOIL POINT	VAPOR DENS	SPEC GRAV	LEL	UEL	704M H	F	R	S
1.	Trichloroisocyanuric acid		X				4 drums								3	0	2	oxy
2.	(dry pool chlorine)																	
3.																		
4.																		

	HAZ CAT TEST ANALYSIS	SLD	LQD	GAS	AMOUNT	ODOR	FUMING	PH	FLAM COMB	SOL	OXY	CHLOR	PEROXIDE	TOXIC
1.														
2.														
3.														
4.														

PERSONNEL		CLASS LEVEL	TIME IN	TIME OUT	EQUIPMENT USED
1ST IN	Arriola	B	Multiple		Disposable suits,
2ND IN	Asencio		entries		turnouts, SCBA
BACKUP	Carrillo				
DRIVER	Acevedo				
CAPT	Weinberger				

AGENCIES	REQ.	ARR.	NAME / ID
HEALTH	1850	2000	Cervantes
SHERIFF / CHP	on scene		prior to our arriv
PUBLIC WORKS			
CAL TRANS			
Montebello FD	unknown		
SCAQMD	1855		unknown
Disposal Control Service			Scott Soden

AIR TEMP: 70° WIND SPD: 3 mph WIND DIR: SW OTHER: ____

COMMENTS, DIAGRAM, ETC.:

Decomposition emitts Nitrogen Trichloride and carboh monoxide, powerful oxidizer.

Smoldering fire involving dry pool chlorine concentrate in a storage shed. Approximately four cardboard drums were involved, the plume area had been evacuated and the ICS set up by E250 and Ch. Brown. Eng. 50 was in the process of mixing the concentrate with soda ash (as recommended by the plant manager). HM 105 crew donned class A protection and relieved Eng. 50's crew. HM 87 personnel donned disposable suits with SCBA to mix the soda ash/chlorine in 55 gal. drums with water. After all the smoldering material was removed from the building and mixed with water the incident was turned over to the Health Dept. for cleanup. The cleanup was to be by Disposal Control Service.

SIGNATURE OF REPORTING OFFICER

ADDITIONAL - OTHER SIDE ☐

DATE: 09-03-88 TIME OUT: ** AT SCENE: 0055 AVAIL: ** HAZMAT INC. #: 87-89

CHIEF: BN. 3 BAISLEY ENG. CO.: 56 HAZMAT SQ: 87-105-76 ADD. UNITS: 2nd ALARM ASSIGNMENT MAU 115, LIGHT 103

INCIDENT LOCATION: 2501 MALT AVE. , CITY OF COMMERCE

RESPONSIBLE PARTY: GROW GROUP CO.

ADDRESS: ABOVE

COMPANY REP: MR. MAX SMITH

TYPE INCIDENT: SPILL ☐ FIRE ☐ LEAK ☐ STORED ☒ DUMP ☐ OTHER CHEMICAL REACTION

MATERIAL NAME	DOT #	SLD	LQD	GAS	TLV PPM	AMOUNT	PH	FLASH POINT	BOIL POINT	VAPOR DENS	SPEC GRAV	LEL	UEL	704M H	F	R	S
TRICHLOROISOCYANURIC ACID	2468	X			N/A	8-30 CAL DRM		NO	NO	N/A	N/A	-	-	3	0	2	OXY
(OR) TRICHLORO-s-TRIAZINETRIONE						200 lb. ea.											
$C_3Cl_3N_3O_3$ - DESCRIPTION																	
SEE 'COMMENTS'																	

-OCNClCONClCONCl- HAZ CAT TEST ANALYSIS	SLD	LQD	GAS	AMOUNT	ODOR	FUMING	PH	FLAM COMB	SOL	OXY	CHLOR	PER-OXIDE	TOXIC
N/A	X			ABOVE	CHLOR	YES	-	NO	YES	HIGH	HIGH 85%	-	YES, BY INGESTION LD 50 = 750 mg/ per Kg

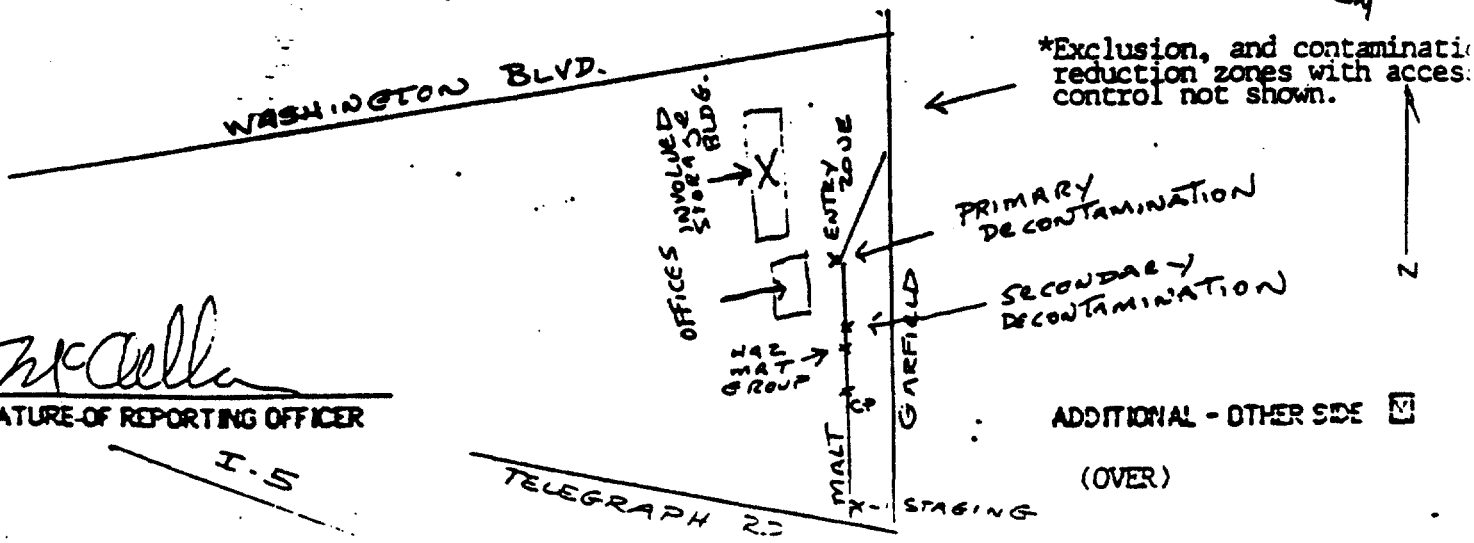
PERSONNEL " B "		CLASS LEVEL	TIME IN	TIME OUT	EQUIPMENT USED
1ST IN	ACEVEDO	A	3 HOUR		PPE, LITES, B.A.'s
2ND IN	DIAZ	A	3 HOUR		POWER SAWS,
BACKUP	ASENCIO	B	4 HOUR		FORCIBLE ENTRY
DRIVER	BRADFORD	A	2 HOUR		TOOLS, SHOVELS,
CAPT	McCLELLAN	C	1 HOUR		DECON KIT, RESPIRATORS, ETC.

AGENCIES	REQ.	ARR.	NAME / ID
HEALTH	0040		M. GARCIA RESPONSE TEAM
SHERIFF / CHP			LASD AT SCENE +CHP
PUBLIC WORKS			NOTIFIED (I-5)
CAL TRANS			
A.Q.M.D.			NOTIFIED
ENG. 50			M. WOLFE
MONTEBELLO F.D., SO. PASADENA, MONT. PARK F.D. SANTA FE SPRGS, SAN GAB. F.D.			

AIR TEMP: 75 F WIND SPD: 5-10 WIND DIR: 360° OTHER:

COMMENTS, DIAGRAM, ETC.:

DESCRIPTION : PRODUCT IS AN ACTIVE INGREDIENT IN BLEACHES, DISINFECTANTS, POOL SANITIZERS, ETC. PRODUCT IS WHITE, SLIGHLY HYGROSCOPIC, CRYSTALLINE POWDER OR GRANULES AND WILL DECOMPOSE AT 225° C. PRODUCT IS NON-COMBUSTIBLE BUT CAN OXIDIZE AND HEAT TO A TEMPERATURE THAT WILL IGNITE COMBUSTIBLE MATERIALS. CHLORINE GAS MAY BE EMITTED UNDER CHEMICAL REACTIONS, THUS CREATING A HIGH RISK TO HUMANS, ESPECIALLY IN REGARD TO LUNG FUNCTIONS. FIREFIGHTING PERSONNEL WITHOUT SPECIAL PROTECTIVE EQUIPMENT SHOULD NOT COME IN CONTACT WITH VAPOR FOR LONG PERIODS OF TIME.



SIGNATURE OF REPORTING OFFICER

ADDITIONAL - OTHER SIDE ☒

(OVER)

AT SCENE : FIRST RESPONDERS FOUND A LARGE STORAGE BUILDING WITH REMOVABLE SIDES, (TARPS), ON THE WEST SIDE ALONG MALI AVE., FULLY CHARGED WITH A GREENISH VAPOR. THE VAPOR WAS BOILING OUT IN MANNER SIMILIAR TO A BUILDING ON FIRE. AREA WAS ISOLATED, AND THE INCIDENT COMMAND SYSTEM WAS ESTABLISHED. OBVIOUS EVACUATION NEEDS WERE HANDLED B THE POLICING AGENCIES AT THE REQUEST OF THE INCIDENT COMMANDER,(IC). LARGE AREAS WERE EVACUATED FROM THREE COMMUNITIES NEARBY. THE EXACT NUMBER OF CIVILIANS IS NOT AVAILABLE AT THIS TIME, BUT THOSE EVACUATED NUMBER IN THE THOUSANDS. EARLY MORNING WINDS AND THE UNKNOWN IDENTIFICATION OF THE PRODUCT MADE EVACUATION VER CRITICAL AT THIS POINT OF TIME IN THE INCIDENT.

ACTION TAKEN : HM 87 & HM 105 WERE BRIEFED BY THE IC, AND IMMEDIATELY ESTABLISHED EXCLUSION ZONE AND CONTAMINATION/REDUCTION ZONES, (DESPITE WARNINGS, INTEGRITY OF THESE ZONES WAS IGNORED BY CIVILIAN EMPLOYEES OF GROW GROUP AND THE NEWS MEDIA). BOTH HAZ-MA FORMED A ENTRY AND DECON TEAM AND COMBINED PERSONNEL FOR INVESTIGATION OF THE PREMISES TO FIND A POSSIBLE SOLUTION. ENTRY TEAMS AT THIS POINT WERE FACED WITH ZERO VISIBILITY AND WERE FORCED TO RETREAT TO THE OPERATION AREA TO REGROUP. LIGH 103 & HM 76 WERE REQUESTED AT THIS TIME.

A SECOND TEAM MADE ENTRY AT THIS TIME TO ATTEMPT VENTILATION. THE TARPS WERE REMOVED AND THE SECOND TEAM RETURNED TO THE OPERATION AREA. AT THIS TIME A ACTION PLAN WAS FORMULATED TO SET UP A NEUTRALIZATION AREA TO HANDLE MATERIALS INVOLVED LOCATED WITH THE ASSISTANCE OF PLANT PERSONNEL WHO HAD ARRIVED AT SCENE. A THIRD ENTRY WAS MADE AND INVOLVED AREAS WERE IDENTIFIED BY PREDETERMINED PERSONNEL WHILE THE REMAINING PERSONNEL BEGAN NEUTRALIZATION OPERATIONS.

AT THIS POINT, EVERCHANGING WINDS CAUSED ALL PERSONNEL TO MOVE FARTHER AWAY FROM THE INCIDENT AND VEHICLES WERE REQUESTED TO TRANSPORT PERSONNEL BACK & FORTH. AFTER CONFERRING WITH THE COMMAND POST, THREE DIVISIONS WERE FORMED AT THIS POINT,

DIVISION A : 12 FIREFIGHTERS UNDER THE DIRECTION OF CAPT. HARRISON TO MAKE FORCIBLE ENTRY INTO THE BACK OF THE BLDG. USING POWER SAWS AND TO REMAIN OUT OF THE VAPOR CLOUD AT ALL TIMES.

DIVISION B : A HAZ-MAT TEAM IN LEVEL A PROTECTION TO WORK INSIDE THE BLDG. & MOVE ALL INVOLVED MATERIALS OUTSIDE TO THE NEUTRALIZATION AREA

DIVISION C : A HAZ-MAT TEAM TO WORK OUTSIDE IN THE NEUTRALIZATION AREA USIN SODA ASH AND DRUMS PROVIDED BY GROW GROUP.

A SECONDARY DECONTAMINATION STATION WAS ESTABLISHED AT THE REAR OF THE OCCUPANCY NEAR THE HAZ-MAT OPERATION AREA, BETWEEN THE INCIDENT AND THE COMMAND POST.

A ROTATION SYSTEM WAS USED ON A THIRTY MINUTE TIME SLOT. PERSONNEL ON HAZ-MAT WERE REQUIRED TO MAKE SEVERAL ENTRIES, USING TRANSPORTATION VEHICLES, GOING THROUGH TWO DECON-STATIONS, AND MONITORING AIR BOTTLES FILLED AT THE ACCESS CONTROL POINTS NEAR THE INCIDENT BY THREE AIR UTILITIES.

AT THIS POINT L.A.CO. HEALTH EMERGENCY RESPONSE TEAMS, COMPANY PERSONNEL, AND THE COMMAND POST AGREED TO REDUCE THE SIZE OF THE EVACUATION AREA AND PREPARE TO ALLOW A DISPOSAL COMPANY TO BEGIN THEIR OPERATION. ALL REACTION AT THIS TIME APPEARED TO BE UNDER CONTROL. FIRE DEPT. PERSONNEL WERE RELIEVED BY THE ON-COMING SHIFT, AT SCENE.

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road / Whittier, California
Mailing Address: / P. O. Box 4998, Whittier, California 90607
Telephone: (213) 699-7411 / From Los Angeles (213) 685-5217

CHARLES W. CARRY
Chief Engineer and General Manager

January 27, 1989
File:02-00.05-00/89-11453C

Mr. Shiv Gaur
Dept. of Public Works
Waste Management Div.
900 S. Fremont Avenue
P.O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Gaur:

Industrial Wastewater Discharge Permit No. -11453 (Ref. I.W. #2627)

Grow Group, Inc.
2501 S. Malt Avenue
Commerce, CA 90040

Enclosed are four (4) approved sets of plans and copies of the approved Industrial Wastewater Discharge Permit for the subject company. Please review these for compliance with your requirements, and retain the copies you require for your files. The Applicant's copy of the approved plans and Industrial Wastewater Discharge Permit, along with a copy of this letter and requirement list, should be forwarded to the applicant. A copy of this letter is forwarded to the applicant to notify him of the Sanitation Districts' permit requirements, which are in force from the current date. If any additional permit requirements are issued to the applicant by your agency, copies should be forwarded to the Sanitation Districts for our records. The approved plans consist of:

1. Dwg. No. COM-8806: Proposed Wastewater Treatment Plan

Approval of the plans and permit is contingent upon continuing compliance with applicable Sanitation Districts' Ordinance requirements, upon any corrections shown in red on the drawings, and upon the items indicated on the attached requirement list.

If you have any questions concerning these requirements, please call Josephine Chow of the Sanitation Districts' Industrial Waste Section at extension 2916.

Very truly yours,

Charles W. Carry

Leon S. Directo
Supervising Civil Engineer

LSD:JC:wh
cc: Mr. Jim Mahar
Grow Group, Inc.
2501 S. Malt Ave.
Commerce, CA 90040

COUNTY SANITATION DISTRICT
OF LOS ANGELES COUNTY, CALIFORNIA

REPORT ON IMPROPER DISPOSAL OF LIQUID/HAZARDOUS WASTES
LANDFILL: PUENTE HILLS

FILE STATUS: closed FILE #: PH022288A

DISCOVERED - Date: 02/22/88 Time: 09:15 By (tecID#): DS
HAULER-Name: ALL SERVICE DISPOSAL DRIVER-Name: EDWARD SARKISIAN
Tel. No.: (213)721-7089 License No.: DO893462
Address : 127 VAN NORMAN RD.
MONTEBELLO, CA 90640

PRODUCER-Name: GROW GROUP, INC.
Tel. No.: (213)724-6530
Address : 2501 MALT AVE.
COMMERCE, CA 90040
Contact Person: BOB ERMER

TYPE OF TRUCK: FRONT LOADER TRUCK NO.: 6 LICENSE PLATE NO.: ALL SD6

TYPE OF LOAD: COMMERCIAL
WEIGHT: 0 MANIFEST #: NA

DATE OF REMOVAL: 02/22/88 DATE OF PAYMENT: NA AMOUNT: $0
ULTIMATE DISPOSAL POINT: PUENTE HILLS
REMOVAL DISPOSAL CO. : NA

COMMENT: RUBBISH IN TRUCK WAS ON FIRE DUE TO UNKNOWN MATERIAL.SITE PERSONNEL SUSPECT HYDROCHLORIC ACID DUE TO ODOR,APPEARANCE.

LETTER ADDRESS TO	PROBATION PERIOD	FIRST LETTER	LAST MEETING
BOB ERMER	N/A TO N/A	N/A	N/A

FINDINGS:

DESCRIPTION	TYPE	AMOUNT	UNIT	STATUS
HYDROCHLORIC ACID (C,A)	H	5.0	GAL	S

LANDFILL: (H.)

DISCOVERED - Date: Time: 0915 By: E. SARKISSIAN | By: M. BARTZ

PH 2-22-86A

NOTIFICATION OF:

Dept. of Health Services - Date: _____ Time: _____ Contact Person: _____

Main Office (JAO) - Date: _____ Time: _____ Contact Person: _____

HAULER - Name: ALL SERVICE DISPOSAL DRIVER - Name: (owner) / driver EDWARD SARKISSIAN

Tel. No.: (213) 721-7089 License No: D0893462

Address: 500 Marek Drive, Montebello 90640 Phone No: _____

PRODUCER - Name: GROW GROUP, INC. Was Producer contacted? _____

Tel. No.: _____ If yes, indicate info received:

Address: 2501 MALT AVE. _____

COMMERCE 90040 _____

TYPE OF TRUCK: FRONTLOADER TRUCK NO.: 6 LICENSE PLATE NO.: ALL 506

TYPE OF LOAD: COMMERCIAL

WEIGHT: NA

FINDINGS (Type of liquid/hazardous waste, no. of containers, sizes, % full, describe waste fully - odor, physical appearance, and other physical observations, including pH. Indicate all the info written on the labels, if any.):

Fire Load: Load contained ~~xxx~~ HCl(l) dumped directly onto paper & other rubbish. No Liquid (HCl) containers found. Water trucks were used to wash bed of rubbish truck and a tractor spread load before it was buried. ~~Spilled~~ Volume of HCl(l) probably 1-5 gal.

SAMPLE - Date taken: _____ Time: _____ Taken by: _____

Date brought to lab: _____

Lab. Job no.(s): _____

Results: _____

ACTION TAKEN: Load buried, 5-10 min Bulldozer, 15 min water truck, 30 min Assistant Site Supervisor and technicians responded to fire 30 min

FURTHER REMARKS OR OBSERVATIONS: Haz. waste: not recoverable

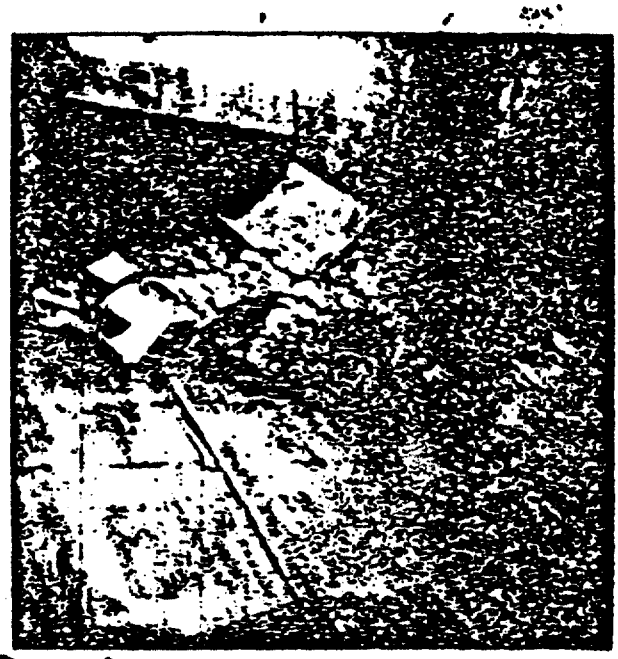
~~Bob~~ Ermer.

213/ 727-6530

- Notified Bob Ermer that: Grow Group, Inc.
2501 Malt Ave.
Commerce, CA 90040

... would be billed for our response effort.

PH 2/22/88 A 0915 HRS
GROW GROUP



PH 2/22/88 A 0915 HRS
GROW GROUP
(FUMES INSIDE TRUCK)

COUNTY OF LOS ANGELES ...
313 N H FIG ROA STREET • LOS ANGELES, CAL

Reply refer to:
2815 South Grand Avenue, Room 807
Los Angeles, CA 90007
(213) 744-

October 4, 1988

Mr. John Lynch
Head District Attorney
Environmental Crimes Division
Hall of Records Room 340
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Lynch:

REQUEST FOR COMPLAINT: GROW GROUP, INC.
2501 Malt Avenue
Commerce, CA

This Department has completed an investigation of the subject company. I have enclosed a copy of the report for your information. We have found that the above company did illegally store and dispose of hazardous waste.

Pursuant to the authority vested in this Department by the California Health and Safety Code, Section 25181, the District Attorney of the County of Los Angeles is requested to file a complaint against the above mentioned company and/or any other related parties.

If you have any questions, please contact Richard Gillaspy at (213) 744-3223.

Very truly yours,

William Jones, M.S., Chief
Investigative Section
Hazardous Materials Control Program

WJ:wa

REPORT OF INVESTIGATION SUM

DATE September 20, 1988 DATE OF INVESTIGATION September 3, 1988

INVESTIGATING OFFICER(S) Miguel Garcia, Richard Gillaspy, William Jones, Marty Kasman, Ken Smith, Frank Cervantes PHONE (213)744-3223

NAME OF SUSPECT(S) / DEFENDANT(S) / AKA(S) Grow Group Inc.; Les W. Wilde, President, Consumer & Professional Products Group; Kim Marti, Plant Manager; Anand Shah, Manager of Environmental Affairs.

ADDRESS 2501 South Malt Avenue, City of Commerce, CA 90040

BUSINESS STRUCTURE AND DESCRIPTION Consumer & Professional Products Group is a subsidiary of Grow Group, Inc., based in New York City.

SERVICE OR PRODUCT PRODUCED Swimming pool chemicals and plastic bottles.

SEC. STATE HEALTH LAW See report.

LOCATION OF VIOLATION(S) 2501 South Malt Avenue, City of Commerce, CA 90040

BRIEF STATEMENT OF VIOLATION(S) Defendants did knowingly and willingly store and dispose of hazardous waste in an unlawful manner. The improper storage of strong oxidizing chlorine containing compounds resulted in a fire and major evacuation.

TYPE OF WASTE DISCHARGED Chlorine containing pool chemicals - ACL 90 PLUS, aka Trichloro(iso)cyanuric acid, aka Trichloro-s-triazinetrione.

DEFENDANT(S) PREVIOUS RECORD See report

REVIEWED BY _____

DATE _____

HISTORY

September 30, 1988

On February 20, 1986, Deputy Health Officers WILLIAM JONES and MARCUS LOOK responded to a chemical fire at GEORGIA PACIFIC, INC., located at 2501 S. Malt Avenue, Commerce. The fire released chlorine gas which forced an evacuation of the area around the plant. The material involved was 300 lbs. of trichloroisocyanuric acid in a fiberboard drum. The material reacted when it became wet from rainfall. The material reacted with the water generating enough heat to ignite the drum.

On February 21, 1986, JONES and LOOK again responded to the same location at the request of the LOS ANGELES COUNTY SHERIFFS DEPARTMENT, who reported that there had been another fire and release of chlorine gas. JONES and LOOK did not observe a fire or gas release when they arrived. JIM MAHAR, a chemical engineer for GEORGIA PACIFIC (G.P.) stated that around 2200 hours he was trying to dissolve calcium hypochlorite in a 3 cubic yard water tight bin. In the process, large chunks of calcium hypochlorite

were placed into the bin and the resulting slurry, pumped to the treatment tank faster than the incoming water. This resulted in the rapid generation of heat, and an explosion causing a 30 foot cloud of chlorine gas. Twelve employees of an adjacent company, Container Corporation of America, complained of exposure, and were treated at a nearby hospital and released. Within 5 - 10 minutes the cloud of gas had dissipated.

On February 22, 1986, JONES and LOOK again responded to a request for assistance from the LOS ANGELES COUNTY FIRE DEPARTMENT at 2501 Malt Avenue, Commerce. GEORGIA PACIFIC employees were attempting to dissolve trichloro-s-triazinetrione in a 7000 gallon plastic tank. A 300 lb. drum of calcium hypochlorite fell off the loading apparatus, into the tank, causing a large explosion which blew the valve off the tank. This resulted in a release of the liquid waste onto the lot. On the same day, a 300 lb. drum of calcium hypochlorite spontaneously oxidized releasing chlorine gas. The Production Manager knocked the drum over in the parking lot and applied soda ash to halt the reaction. Four other drums of the same material began to react releasing low levels of chlorine gas. Official Notice of Violation, No. 044687 was issued at that time to M. GOLDSTEIN, a GEORGIA PACIFIC representative.

On June 2, 1987, Deputy Health Officer BRUCE WOJCIK went to GROW GROUP, INC. located at 760 South Vail Avenue, Montebello, to

conduct a routine inspection. The inspection was in response to a complaint that alleged the company had leaking containers on the premises. WOJCIK spoke with the Technical Advisor, MICHAEL GOLDSTEIN. GOLDSTEIN stated that the President was RUSSELL BANKS and the Plant Manager was KIM MARTY. GOLDSTEIN stated that the company blends and packages cleaning products. WOJCIK observed that one drum of resin at the location was leaking to the ground. Waste solvent was being stored in 55 gallon drums. The hazardous waste drums were not labelled or dated per hazardous waste requirements. GOLDSTEIN indicated that the drums were stored longer than 90 days. Empty aerosol cans were smashed and sent under manifest to a Class I disposal site. WOJCIK issued a Notice of Violation (Dated July 1, 1987) to GROW GROUP, INC.

On July 9, 1987, Deputy Health Officers BRUCE WOJCEK and SAL MOLLEDA conducted a routine inspection of GROW GROUP, INC., located at 2501 Malt Avenue, Commerce. WOJCIK and MOLLEDA spoke with GUSTAVO RAMOS, the personnel manager. RAMOS stated that the President was RUSSELL BANKS. RAMOS indicated that the company was chemicalblenders, manufacturing swimming pool bleach and acid. RAMOS told WOJCIK and MOLLEDA that there are no chemical wastes for removal from the premises. RAMOS stated that all waste is neutralized and sewered. WOJCIK stated that he observed drums in the storage area shown on the map that was given to him during the inspection. RAMOS told WOJCIK that the material (about 50 drums) was chemical waste. The waste was in fiberboard drums.

The drums did not have hazardous waste labels. The drums had the word "waste" printed on them with a marker. RAMOS told WOJCIK that the material was floor sweepings from the process area. After the inspection they went into the office and issued a notice of violation (dated July 9, 1987) to the plant manager, ROBERT ERMER. RAMOS told WOJCIK and MOLLEDA during the inspection that the warehouse on the north side of the lot was for storage of raw materials only, so they did not look in that building.

On March 30, 1988 Deputy Health Officer, FRANK CERVANTES went to GROW GROUP, INC. in response to a Chlorine gas release at 2501 S. Malt Ave., Commerce. A bucket of dry chlorine tablets and floor sweepings had reacted with waste oil. The reaction caused the release of "smoke". The bucket was taken outside and the material spread on the ground. CERVANTES told the plant manager, BULMARO RAMOS that spreading the material on the ground may make the situation worse or cause injury to the employees. CERVANTES issued a Notice of Violation (dated March 30, 1988) to properly dispose of the material as hazardous waste.

On August 10, 1988, Deputy Health Officers, FRANK CERVANTES and SAL MOLLEDA responded to a request for assistance from the Los Angeles County Fire Department at GROW GROUP, INC., 2501 Malt Ave., Commerce. Three 30 gallon containers of dry chlorine had reacted and released a cloud of chlorine gas. CERVANTES and

MOLLEDA observed a large number of fiberboard carboys inside the warehouse facility where the three reacting containers were found. There were no hazardous waste labels on the three reacting containers, or any of the containers observed during the incident. CERVANTES issued a Notice of Violation (dated August 10, 1988) to properly dispose of hazardous waste by a State Health Department registered hauler.

On September 3, 1988, Deputy Health Officers MIGUEL GARCIA and MARTY KASMAN responded to a request for assistance from the Los Angeles County Fire Department. A cloud of chlorine gas was released which forced the evacuation of 20, 000 persons. The chlorine gas was coming from a warehouse at GROW GROUP, INC., 2501 Malt Ave., Commerce. The incident occurred in a warehouse . Condensation from the walls and ceiling were dripping on the containers. The water and material in the containers reacted producing heat and chlorine gas. Garcia issued company representatives Notice-of-Violation 055679, to immediately dispose of all hazardous waste and contaminated materials.

On September 4, 1988 GARCIA and KASMAN were again called to the same loctaion. They were advised that another release of chlorine gas had occurred.

On September 9-10, 1988, the hazardous waste at 2501 Malt Ave., Commerce was ultimately disposed.

RG: jm: wa

2615 S GRAND AVE 101
LOS ANGELES, CA 90007
(213) 744-3235
(OFFICE ADDRESS)

RAY PLATE, GEN MGR

County of Los Angeles Department of Health Services
Community Health Services — Environmental Management

-1-

DATE 2-22-86

TO GEORGIA PACIFIC CORPORATION — ADDRESS 2501 MALT AVE COMMERCE 90040

SUBJECT HAZARDOUS WASTE — ADDRESS S.A.A.

YOU ARE HEREBY ORDERED TO:

1) Discontinue immediately, any further onsite treatment or neutralization of "ACL-90, ACL-60, or Calcium hypochlorite" waste (until further notice)

2) Take immediate action to properly / legally remove and dispose of all returned "hazardous waste" including but not limited to 71x300 lb drums of ACL-90; 24x300 lb drums of ACL-60 and 32x300 lb drums of Calcium hypochlorite. This action taken must be approved by Department personnel prior to commencement.

3) All hazardous waste transported off site must be transported under a Hazardous Waste Manifest by a SDOHS registered hauler

—CONT'→

This notice shall be complied with as required by: ☒ State Health and Safety Code, ☒ California Administrative Code, ☐ Los Angeles County Ordinance No. 7583, ☐ _____ City Ordinance No. _____, Other Code _____

CORRECTION DATE AT ONCE

RECEIVED BY Mike Boerder

MAIL SERVICE: ☐ FIRST CLASS ☐ CERTIFIED

LOS ANGELES COUNTY HEALTH OFFICER

BY William Jones, M.S. (TITLE)

H-777 (REV. 3/75) 760298

(White - VIOLATOR; Canary - SANITARIAN; Pink - DISTRICT DIRECTOR)

HAZARDOUS WASTE CTL PGM
2615 S GRAND AV Rm607
Los Angeles, CA 90007
(213) 744-3235
(OFFICE ADDRESS)

RAY PLATE, GEN MGR

OFFICIAL NOTICE OF VIOLATION No 044689

County of Los Angeles Department of Health Services
Community Health Services — Environmental Management

-2-

DATE 2-22-86

TO GEORGIA PACIFIC CORPORATION — ADDRESS 2501 MALT AVE COMMERCE 90040

SUBJECT HAZARDOUS WASTE — ADDRESS SAA

4) Provide this office by 3-7-86, a "photocopy" of the completed manifest used to dispose of the aforementioned hazardous waste.

5) Store forthwith all hazardous waste in a secure, contained weatherproof and well posted manner pursuant to CAC Title 22 Sec. 66508 / 67120

6) Store forthwith, all hazardous waste in non-leaking properly labeled and dated containers with tight fitting lids.

7) Discontinue immediately the transport / reciept of hazardous waste from distributors until an approved treatment system is formulated and agreed upon by the State and County DOHS

This notice shall be complied with as required by: ☒ State Health and Safety Code, ☒ California Administrative Code, ☐ Los Angeles County Ordinance No. 7583, ☐ _____ City Ordinance No. _____ Other Code _____

CORRECTION DATE AT ONCE

RECEIVED BY Mike Boerder

MAIL SERVICE: ☐ FIRST CLASS ☐ CERTIFIED

LOS ANGELES COUNTY HEALTH OFFICER

BY William Jones, M.S. (TITLE)

H-777 (REV. 3/75) 760298

(White - VIOLATOR; Canary - SANITARIAN; Pink - DISTRICT DIRECTOR)

LOS ANGELES, CA 9021
(213) 744-3235
(OFFICE ADDRESS)

County of Los Angeles Department of Health Services
Community Health Services — Environmental Management

-3-

DATE 2-22-86

RAY PLATE, GENERAL MGR.
TO GEORGIA PACIFIC CORP. ADDRESS 2501 MALT AVE COMMERCE 90040
SUBJECT HAZARDOUS WASTE ADDRESS S.A.A.

8) REMOVE AND legally dispose of all hazardous waste (ACL-90 ACL-60) spilled from the 7500 gal above ground tank in the treatment area.

This notice shall be complied with as required by: ☒ State Health and Safety Code, ☒ California Administrative Code, ☐ Los Angeles County Ordinance No. 7583, ☐ _____ City Ordinance No. _____, Other Code _____

CORRECTION DATE At Once

RECEIVED BY [signature]

MAIL SERVICE: ☐ FIRST CLASS ☐ CERTIFIED

LOS ANGELES COUNTY HEALTH OFFICER

BY [signature] M.S.
(TITLE)

H-777 (REV. 3/75)
760298

(White - VIOLATOR; Canary - SANITARIAN; Pink - DISTRICT DIRECTOR)

COUNTY OF LOS ANGELES DEPARTMENT OF HEALTH SERVICES
ENVIRONMENTAL HEALTH/HEALTH FACILITIES
HAZARDOUS MATERIALS CONTROL PROGRAM

REPORT OF INVESTIGATION

REPORT PREPARED BY/INITIALS	DATE	LOG NUMBER
Richard Gillaspy HMS-III	September 23, 1988	882945-111

SUSPECT NAME/ADDRESS	DATE OF INVESTIGATION
Grow Group, Inc. 2501 South Malt Avenue Commerce, CA 90040	September 6, 1988

SUMMARY

On September 6, 1988, Deputy Health Officers Richard Gillaspy, Kenneth Smith and Pete Torres conducted an inspection at Grow Group, Inc., 2501 Malt Ave, Commerce as a follow-up to a hazardous materials incident on September 3, 1988. Gillaspy spoke with the Plant Manager, Kim Marti (N7819910). Gillaspy explained that the Health Officers would like to make an inspection of the facility. Gillaspy also explained that they would like to take photographs and samples. Marti stated that he had no problem with that. Marti had Gillaspy, Smith and Torres go on the inspection with the Environmental Affairs Manager, Anand C. Shah (C2448997). Shah stated that his boss was Don Green, Director of Research & Development. Shah said he had only been employed here about 3 weeks. The last Environmental Affairs Manager was Michael Goldstein. Gillaspy asked Shah what the white powder all over the lot was. Shah stated that it was ACL-90 Plus. He continued by saying that some of the powder falls on the floor and is swept up and placed in the fiberboard drums. Shah says he is a Chemical Engineer. When asked how bad the material is, he said, "Not that

bad". Shah showed Gillaspy, Smith and Torres the drug storage area where the fire occurred. Gillaspy, Smith and Torres observed fiberboard drums, some without the lids on, some damaged with holes in them. Some had the word "waste" printed on them. Gillaspy underlined the word "waste" on one of the drums. Gillaspy asked Shah what the word meant. Shah stated that the material in the drums comes off the floor and can not be used again. He continued by saying the fiberboard drums contain waste. He said, "we can't use it. It's not useable." He said that he was told this by his boss, Don Green. Shah stated that the corporation owns all of these containers. He also said that the corrosion to the lids and containers occurred over a period of time. Gillaspy, Smith and Torres observed no drums with proper labelling or dating.

Shah continued the inspection by showing the manufacturing and dispensing areas. The company manufactures and packages pool chemicals in both the liquid and solid form. In the tablet manufacturing area, Gillaspy and Smith observed the powder and broken tablets on the floor under the equipment. Shah stated that broken tablets are reground and put back in the process. He said the powder was contaminated and went into waste containers. This was the material that was put in the waste storage area. Gillaspy asked Shah for copies of material safety data sheets for the materials. Gillaspy asked Shah if he could see any manifests from the files. Shah introduced Gillaspy to Glorietta Crawford (3-28-88). She stated that she maintains the hazardous waste manifests. She stated that the company has not shipped any of these materials since she has been with the company. Crawford stated that the company neutralizes the material on-site. She said to talk to Marilou, the Quality Control Manager. Gillaspy reviewed the manifests. The earliest in the file was dated 12-03-82. It now manifest No. 8202490 for hazardous waste liquid. By Georgia-Pacific. Georgia-Pacific's EPA ID No. CAD 085393080. The last manifest in the file was No. 84314552 dated 02-22-86. Crawford said that Grow Group, Inc. took over in Aug. 1986.

On September 6, 1988, Gillaspy and Smith went to Grow Group, Inc., located at 760 So. Vail Avenue, Montebello. They spoke with Marilou Capalongan. She stated that Casandra Byron and Mike Goldstein manifested hazardous waste. She stated that for a time she contracted registered hazardous waste haulers. She had contracted chemical waste management and Crosby & Overton. The last time she says she contracted a registered hauler was in

February 1986. The manifest was No. 84248240 with EPA ID No. - CAD 84248240 with EPA No. CAD085393080. She stated that right after that, the corporation started separation and neutralization of waste. She said that she does not know of any manifests after February of 1986. She continued by stating that the material is reactive, she said that there has been 3 incidents involving the material in the last 3 years. She added that Mike Goldstein was responsible for the contingency plan. Mike Goldstein (40 yr, 6'3", 300 lbs, Cauc) is now employed by Amrac in Santa Ana.

On September 8, 1988, Gillaspy spoke with Gary Armstrong of the Los Angeles County Sanitation Districts (LASD). Armstrong stated that on February 22, 1988 Grow Group, Inc., improperly disposed of hazardous waste at Puente Hills Landfill. Armstrong stated that the incident involved a truck fire at the landfill. The truck belonged to All Service Disposal Co. (213-721-7089), 127 Van Norman Road, Montebello, CA. The load that caused the truck fire came from Grow Grou, Inc., 2501 Malt Ave., Commerce. Armstrong said that the truck driver had a fire in the load. Sanitation District employees attributed the fire to chlorine material in the load.

On September 12, 1988, Roy Thielking, an inspector for the California Department of Health Services telephonically spoke with gillaspy. He stated that Georgia-Pacific filed a Part A application. He stated that he thought they were an ISD (Interim Status Document). He stated that the Department (CDOHS) never issued an ISD to either Georgia-Pacific or Grow Group, Inc. He states that he was the last inspector to inspect Grow Group, Inc., at Malt Ave. Mary Osborne was the other inspector with him.

On September 12, 1988, Gillaspy spoke telephonically with Milton Baartz of the Los Angeles County Sanitation District. Baartz stated that the truck involved in the fire on February 22, 1988 was a top loader. Evidence of the origin of the fire was the chemical containers in the truck. There were containers of oxidizer in the load. The containers were open. The load had a very strong odor of chlorine. The liquid chlorine in the load was mixed in sand and the sand was boiling, bubbling and fuming. The material was corrosive because it caused pitting in the steel in the bed of the truck.

On September 12, 19888, Gillaspy spoke telephonically with Dave Stead, a former employee of the Los Angeles County Sanitation District (LASD). Stead stated that the truck involved in the February truck fire was a front loader. A sanitation district water truck put out the fire after the load had been dumped. The operator of the truck, Mr. Sarkisian, told Stead that they had previous problems with Grow Group. Stead said that Larry Barons was the first Sanitation District employee on scene. They were trying to determine what caused the fire. The determination was made by the type of material, its characteristics, the containers in the load, Sarkisians knowledge of the route, association of the material and the fire. Stead said that Barons keeps a log book of incidents at the landfill

COUNTY OF LOS [illegible] DEPARTMENT OF HEAL[illegible] [illegible]CES
ENVIRON[illegible]NTAL HEALTH/HEALTH FACILITIES
HAZARDOUS MATERIALS CONTROL PROGRAM

REPORT OF INVESTIGATION

REPORT PREPARED BY/INITIALS	DATE	LOG NUMBER
Miguel Garcia, HMS III	September 16, 1988	882945-111

SUSPECT NAME/ADDRESS	DATE OF INVESTIGATION
Grow Group, Inc. 2501 South Malt Avenue Commerce, CA 90040	September 3, 4, 1988

INCIDENT REVIEW

On September 3, 1988, shortly after midnight, a Los Angeles County Fire Department (LAFD) engine unit discovered what appeared to be smoke in the vicinity of the Grow Group, Inc. (GGI) facility located at 2501 Malt Avenue, Commerce. Upon further investigation, Captain M. Wolfe determined the cloud to be chlorine coming from a storage structure on the north side of GGI. At approximately 12:20 a.m. a First Alarm was declared and additional assistance requested. Notification of an evacuation of the surrounding area was given at approximately the same time. Captain Wolfe and other fire personnel on-scene determined there was no rescue problem at the facility and requested assistance from the LAFD Hazardous Material Unit and other support personnel on scene. At the time of discovery, winds at the incident were westerly, and light.

During the incident, the wind changed direction several times, but generally in a westerly direction. The Los Angeles County Sheriff's Department blocked all streets to public traffic in the vicinity of the incident. Law enforcement officers from the County and neighboring communities such as Montebello assisted in the evacuation of residents in the immediate area of concern. A command post was set-up by the LAFD to coordinate activities associated with the incident. Battalion Chief David Baisley was the scene commander and coordinated the activities in close proxity to the chlorine cloud incident. The chemical gas involved was chlorine which was known as a result of a previous incident several weeks before, the chlorine odor which was detected, and personnel on scene familiar with processes at the facility.

The storage building involved was a sheet metal structure occupying a space approximately 90 x 180 feet and approximately 20 feet high. Captain Harris, one of the LAFD's Hazardous Materials captains on scene, described what he saw when he entered the building.

According to Captain Harris, the greenish colored cloud was so thick within the structure that it reduced visibility to near zero. The curtains on the east side of the structure were lifted to provide ventilation and increase visability. Captain. Harris stated that in the area where the reaction was occurring, the material involved actually glowed from the heat generated. Concern for safety prompted the request for all LAFD Hazardous Materials Teams to respond.

Twelve (12) Haz-Mat firefighters approached the structure from two sides. Some entered from the back after cutting an opening into the sheet metal wall. Others entered from the front helping remove drums to allow access. The heat was so intense that the firefighters could only work minutes at a time. All Haz-Mat firefighters were in fully protective clothing and equipment. Condensate on the walls and ceilings was observed by some of the firefighters dripping back onto the tops of unreacted drums, and they stated popping sounds could be heard on the metal tops of the unreacted drums. The forklift used to move the pallets of materials frequently stalled (possibly as a result of a lack of air). All three LAFD's Hazardous Materials Captains described the heat so intensed that the boots of firefighters were burning the feet of personnel which entered the structure. A problem did arise when the material caked on the boots of the fire personnel.

At least one first degree burn was experienced by one of the hazardous materials captains. Other firefighters experienced respiratory discomfort when the cloud jumped the designated hot zone of the incident (sore throats were a common complaint). Three LAFD Hazardous Material captains described exhausting personnel and equipment to the limit to obtain control of the reaction. The structure was considered a confined space.

LOS ANGELES COUNTY HEALTH DEPARTMENT - MIGUEL GARCIA

At approximately 1:00 a.m. M. Garcia (Hazardous Material Control Program) received a call through the Los Angeles County Operator

requesting the Department's Hazardous Material team to respond to a chlorine cloud generated at 2501 Malt, in the City of Commerce. The County Operator advised me of an evacuation in progress and gave directions where the LAFD had set-up their Command Post. M. Garcia advised his partner, Marty Kasman, of details received through dispatch about the incident and requested his assistance. At approximately 1:30 a.m., M. Garcia arrived and found a large thick, lowlying cloud approximately 150 feet into the air, flowing in a westerly direction. The cloud was emerging from a sheet metal structure on the north end of the GGI property and the whole structure appeared to be involved with a constant outflow of smoke. M. Garcia reported to the Fire Command Post with M. Kasman where we were briefed on details about the facility and available information on the chemical involved.

Two (2) LAFD Hazardous Material entry teams were assessing the incident and preparing to enter the structure to evaluate what could be done to stop the reaction. A summary of their observations are included above. Personnel from the company advised the LAFD of types of materials were occupying the structure. I was informed by Captain Wolfe from the LAFD of a previous incident at Grow Group, Inc., approximately two (2) weeks prior involving a chlorine release from similar containers.

At approximately 2:30 a.m., M. Kasman and M. Garcia met with the company representatives, Kim Marti (Plant Manager) and Don Green (Director R&D) to issue a notice of violation which addressed contingency planning, and discontinuing of all operations which can contribute to future chlorine releases. The company was advised to obtain a professional hazardous waste clean-up company to remove waste generated as a result of the incident. After interviewing representatives from GGI to their knowledge of a previous incident, an administrative office hearing notice was issued to the company to insure and/or guarantee LADHS of all necessary steps being taken to prevent future releases from this facility. At this time the wind had shifted to an easterly direction. At approximately 2:30 a.m., an evacuation was requested by LAFD of residents and businesses east of the Grow Group facility. Both the Hyatt Hotel and the Commerce Card Club were evacuated as precaution. The wind continued to change direction and at one point circled around from the west to exposure of all personnel at the command Post and those LAFD Hazardous Materials Team members trying to stop the reaction.

Preliminary reports from LAFD entry teams described the cloud so thick that it was causing difficulties in visibility.

Between approximately 3:00-4:00 a.m. Frank Cervantes and Dr. Paul J. Papanek from LADHS were sent to the evacuation centers to address the public concerns regarding the evacuation and the toxicology of the chemical (See report by Frank Cervantes).

At approximately 7:30 a.m. the president of GGI, Les Wilde, arrived and was informed of the notice issued by this Department. At approximately 9:00 a.m. a meeting was held with agencies involved in the clean-up operation and to company representatives (Don Green, Kim Marti and Mack Smith) to plan a strategy to clean-up and secure the drums in such a way as to prevent future releases. From the meeting, all available information was gathered and a plan developed on how to procede with the clean-up. At approximately 11:00 a.m. additional personnel from the clean-up company and Disposal Control Services (DCS) arrived and began repackaging all damaged drums. A meeting was held with LADHS's Emergency Response teams members (Miguel Garcia, Martin Kasman, Samir Ibrahim, John Schoepf), the Environmental Protection Agency (EPA), (N. Parson), the Air Quality Management District (AQMD), (M. Haynes), and company representatives. The incident was turned over to the primary LADHS Emergency Response Team at approximately 12:00 p.m. and the clean-up continued with little problems.

On September 4, 1988 at approximately 5:30 a.m. M. Garcia received another telephone call from the Los Angeles County Operator. M. Garcia was advised on another release occurring at the same facility. Approximately 20 minutes later, M. Garcia arrived and found another chemical cloud. Upon further investigation, M. Garcia interviewed employees from DCS and they explained that in the process of stabilizing the chemical for repackaging a reaction occurred. This reaction was smaller and limited to only the material in the process of being stabilized. The cloud dissipated quickly and the evacuation which was called by LAFD was quickly cancelled. The evacuation lasted approximately one (1) hour.

At approximately 9:00 a.m. a second smaller reaction occurred within a metal 55 gallon drum. LAFD quickly responded and knocked-down the reaction within thirty (30) minutes to minimize the dangers of the chemical. No evacuation was necessary. The chlorine cloud was contained on the boundary of the company property line. Another meeting with government agencies company representatives and Monsanto, the manufacturer of the chemical, was held to obtain additional technical assistance on planning strategy to continue future release and/or minimized the reaction. After the 9:00 a.m. reaction, no further reactions occurred. A 24 hour surveillance by LADHS was placed on GGI as a precaution to prevent and/or minimize future reactions. Additional LADHS personnnel were contacted and scheduling was arranged to provide coverage of personnel like myself who were present during the critical period during the chemical reaction occurrence.

Other agencies responding to the incident included the California Highway Patrol (CHP), Pasadena Fire, Montebello Police, and Bell Gardens Police.

Description of Storage Area

The storage area involved in the September 3 and 4 chemical incidents was located on the north end of the property. The corrugated metal structure occupied a space approximately 90 X 180 feet and was approximately 20 feet high. The drums involved in the incidents occupied a fourth of the structure on the far north side. The structure was not posted and had no marking to indicate a chemical storage area was present. The structure had heavy green plastic curtains hanging on the east side of the structure. The storage structure is mainly used to store cardboard boxes.

The drums found within the structure were closely inspected after all releases had subsided and the area was ventilated by the LACFD. Both Mr. Kasman and M. Garcia inspected the drums on both dates of this report. The structure contained approximately 200 fiber board drums, most on pallets. No hazardous waste labels were found on any of the drums inspected. Most of the drums were marked in black ink with the words "waste Trichloro", or "waste". Most were labeled with dates in August. Most of the drums had the original manufacture's label with the lettering "ACL 90" on them.

Approximately a quarter of the drums were torn, or damaged and drums involved in the chemical reaction were blackened. There was spilled material everywhere where the drums were stored, mainly powder where the chemical reaction occurred and a dark brown paste on the tops of the drums and on the floor. The walls and ceiling in the immediate area were coated with this brown paste, forming droplets in most instances. Some of the drums were found with torn plastic liner. The drums, when first found, were organized in a tight formation allowing very little access to the drums stored in the back of the structure.

ject | Date | No.

GROW GROUP, INC. 2501 MALT AVE., COMMERCE, CA 90040 9/13/88

On September 8, 1988, Hazardous Materials Specialist Gerald Munoz, Sal Molleda and Bruce Wojcik reported to the subject facility to witness and record the loading and removal of the hazardous waste generated by the September 3, 1988 incident.

The following is the summary of the data collected during the observation.

Vehicle	Date and Time of Departure*	Number of Containers	Approximate Weight(pounds)	Manifest Number
1	9-8-88 11:30 p.m.	92	36,800	87534289
2	9-9-88 2:30 a.m.	51	28,870	87534275
3	9-9-88 3:30 a.m.	51	28,870	87534274
4	9-9-88 10:00 p.m.	92	38,000	87534276
5	9-9-88 11:30 p.m.	61	31,500	87534290
6	9-10-88 1:45 a.m.	87	34,800	87534288
7	9-10-88 3:00 a.m.	32	12,800	87556444
8	9-10-88 7:30 a.m.	70	27,400	87534292
9	9-12-88 2:00 p.m.	16	6,400	87553971
TOTALS		552	245,440	

*Times are approximation

GM:bp

GROW GROUP, INC.
2501 Malt Avenue
Commerce, CA 90040

SAMPLING PROTOCOL FOR BUILDING NUMBER 5

1.0 CHEMICAL CHARACTERISTICS AND ENVIRONMENTAL BEHAVIOR

1.1 Chemicals Stored in Building Number 5

The following chemical products have been stored in Building Number Five at one time or another.

Merck # 8896
- Trichloroisocyanuric acid (Trichlor) Disinfectant / Oxidizing agent
- Dichloroisocyanuric acid (Dichlor)
- Lithium Hypochlorite

8417
- Sodium Bisulfate Soluble - PH 0.1

8519
- Sodium Sesquicarbonate OK
- Sodium Carbonate OK

2691
- Cyanuric acid Selective herbicide

1.2 Physical Properties of the Chemicals Stored in Building Number 5

All of the chemicals listed above occur in the solid state at standard temperature and pressure. Additional chemical specific properties are outlined in Table 1.1.

1.3 General Evaluation of Chemical Movement and Transformation

1.3.1 Movement of Chemicals Through Concrete and Asphalt

Since concrete and asphalt are relatively impervious and non-reactive with the identified chemicals, migration through these substances is not expected.

1.3.2 Movement of Chemicals in Soil

Migration of the above listed chemicals into the soil from Building Number 5 would not be expected unless a medium, such as water, was available to transport the chemical to the soil. Once in the soil, those chemicals which are minimally soluble in water, or do not undergo a chemical reaction with water, would be expected to remain relatively close to the soil surface. The mobility of the chemicals

that solubilize in, or react with, water will be dependent on the amount of water present, the physical properties of the chemicals, and the composition of the soil itself.

1.3.3 Transformation of Chemicals

The chemicals listed in 1.1 may also undergo transformation before or after entering the soil. Since the chemicals occur as solids, any chemicals that enter the soil would be expected to be transformation products of the original chemicals. The transformation products of each identified chemical stored in Building Number 5 are listed below. These transformation products would eventually result in nonhazardous elements and materials.

Trichloroisocyanuric Acid

This chemical, when reacted with water, forms an innocuous amine compound and cyanuric acid Chlorine gas is also emitted but it readily dissipates into the atmosphere.

Dichloroisocyanuric Acid (Sodium Dichloroisocyanurate)

This chemical, when reacted with water, forms an innocuous amine compound and cyanuric acid Chlorine gas is also emitted, but it readily dissipates into the atmosphere.

Lithium Hypochlorite

This chemical, when reacted with water, disassociates to create lithium and hypochlorite ions. The hypochlorite reacts further to create hypochlorous acid.

Sodium Bisulfate

This compound disassociates in water to create innocuous sodium and bisulfate ions. The bisulfate ions react further to create a weak sulfuric acid solution.

Sodium Sesquicarbonate

This compound when reacted with water, disassociates to form sodium ions, carbonate and bicarbonate ions, and water.

Sodium Carbonate

This chemical disassociates in water to form sodium and carbonate ions.

Cyanuric Acid

This compound is only slightly soluble in water. Therefore detectable transformation products from this chemical would not be expected.

2.0 SAMPLING METHODOLOGY

2.1 Areas of Building Number 5 Requiring Sampling

There is only one section of the Building that would require sampling. This section of the Building is covered with highway grade asphalt and is impervious to the chemicals identified as being stored in the Building.

2.1.1 Sampling Method for the Impervious Area

The most practicable method for sampling residuals on asphalt or concrete is by performing the wipe test prescribed in EPA's method SW-8280. Since this method is typically used to wipe test for residual polychlorinated biphenyls or dioxins, it would be modified as necessary to wipe test for the identified chemicals.

Building Number 5 is approximately 17,000 square feet in size. The material in question was stored only in one of the five existing bays. This bay will be segmented into three equal sections and identified as grid sections A, B and C. Three wipe tests will be conducted in each grid area. Each wipe test will be identified by a grid letter and sample number one, two or three, within each grid section. The numbering sequence identified in Figure 2.1 will be followed to prevent confusion.

2.2 EXTERIOR AREAS

The areas outside the Building are constantly exposed to the elements of weather (i.e., moisture of the air and rain), it would be expected that any chemicals have reacted with water and have formed their respective transformation products. Since none of the transformation elements at the exceedingly low concentrations which could be expected, would be hazardous to the environment, no sampling plan is proposed for areas outside the Building.

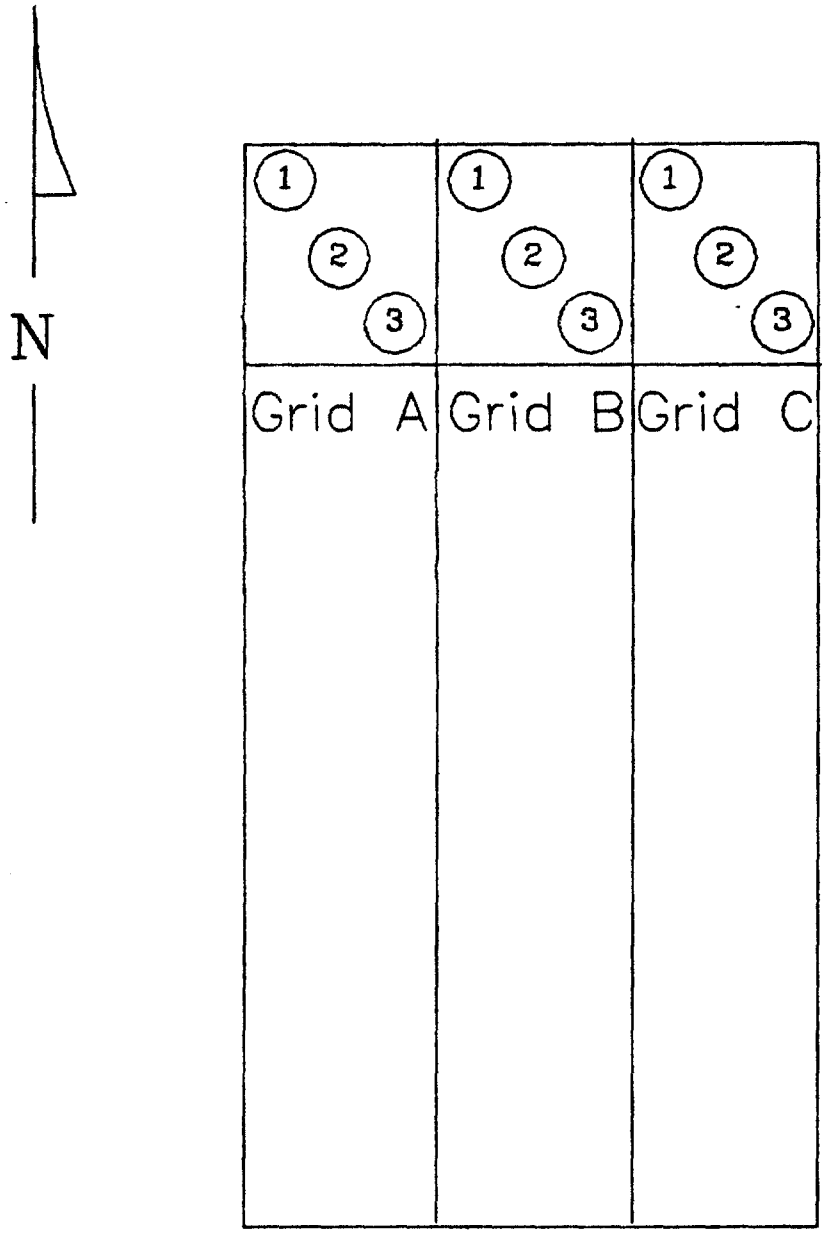
3.0 SAMPLE ANALYSIS PLAN

Based on the hazards of reactivity and ignitability potentially existing for the chlorinated oxidizers, an available chlorine will be run on all samples. Additionally, a pH test will be performed on all of the samples to verify a corrosivity hazard is not present. All sample analyses will be conducted by a laboratory certified by the State of California Department of Health Services.

TABLE 1.1

PHYSICAL/CHEMICAL PROPERTIES OF SELECTED CHEMICALS STORED IN BUILDING NUMBER FIVE

COMPOUND	EMPIRICAL FORMULA	MOLECULAR WEIGHT	MELTING POINT ^{o}C	BOILING POINT ^{o}C	SOLUABILITY IN WATER
TRICHLOROISO-CYANURIC ACID	$C_3N_3O_3Cl_3$	232.42	225-230	DECOMPOSES	0.2%@25^{o}C (REACTS WITH WATER)
SODIUM DICHLORO-ISOCYANURIC ACID	$C_3N_3O_3Cl_3N$	219.97	240-250	DECOMPOSES	2.5%@25^{o}C (REACTS WITH WATER)
LITHIUM HYPO-CHLORATE	LiOCl	58.38	DECOMPOSES	N/A	30%@25^{o}C
SODIUM BISULFATE	$NaHSO_4$	104.07	117	DECOMPOSES	100%@25^{o}C
SODIUM SESQUI-CARBONATE	Na_2CO_3 $NaHCO_3$ $2H_2O$	190.0	DECOMPOSES	N/A	13%@0^{o}C 42%@ 100^{o}C
SODIUM CARBONATE	Na_2CO_3	106.0	851	DECOMPOSES	33%@25^{o}C
CYANURIC ACID	$H_3C_3N_3O_3$	129.08	DECOMPOSES	N/A	N/A



Building #5
(Approx 16,000)

Grow Group Inc.
Consumer & Professional Products Group

Wipe Sample Locations

Commerce, California

DWG #COM-8823
12/22/88

Figure 2.1

GROW GROUP, INC.
2501 Malt Avenue
Commerce, CA 90040

CLOSURE PLAN FOR TRICHLOROISOCYANURIC ACIDS TANK #3

BACKGROUND

Currently, an empty 6,000 gallon tank is situated outside at the southeast corner of the liquid fill line building at GGI's Commerce facility (see the attached site plan). Trichlor, a solid under normal conditions, is pressed into tablets at the City of Commerce facility. These tablets are then distributed as stabilized "chlorine" tablets and are typically used for swimming pool water treatment. During the operation of pressing the powder into tablets, trichlor dust settles within the production areas. The dust is swept up and placed in drums and handled as hazardous waste.

DISCUSSION

There are three areas which could require decontamination: the 6,000 gallon polyethylene tank; the ancillary piping and equipment associated with the tank; and approximately 2,500 square feet of surface area identified as containment on the enclosed drawing. The preferred solvent to employ in the decontamination of the spent trichlor areas is a weak base solution, such as sodium hydroxide. This preference is based on the fact that a weak base will minimize the release of a chlorine gas.

Disposal of the wastewater generated from the decontamination procedures will be disposed of by one of two ways. The preferred method will be to test the water and, if it meets the criteria required for discharge to the sewer, discharge it to the local POTW (provided the submitted application is formally approved). If the POTW will not allow the discharge, the wastewater will be pumped into approved hazardous waste tankers and shipped to a permitted hazardous waste facility for disposal.

Ancillary Equipment

All piping, hoses, pumps, and other in-line equipment associated with the tank will be triple rinsed with sufficient amounts of water. The water will be accumulated in the tank. After the first rinsing, the accumulated water will be tested to determine

acceptability at the POTW. A decision will be made at this time for the most appropriate method of disposal. After the third rinsing, a sample will be taken to ensure that the equipment has been properly decontaminated.

Hazardous Waste Tank (#3)

The 6,000 gallon polyethylene tank will also be decontaminated using the triple-rinsing technique. In this circumstance, however, a high pressure Troll ball (spray ball) will be necessary to ensure that all internal surfaces of the tank have been adequately reached by the water. Again, samples will be taken after the first rinsing to determine the proper method of disposal and after the third rinsing to ensure the tank is properly decontaminated.

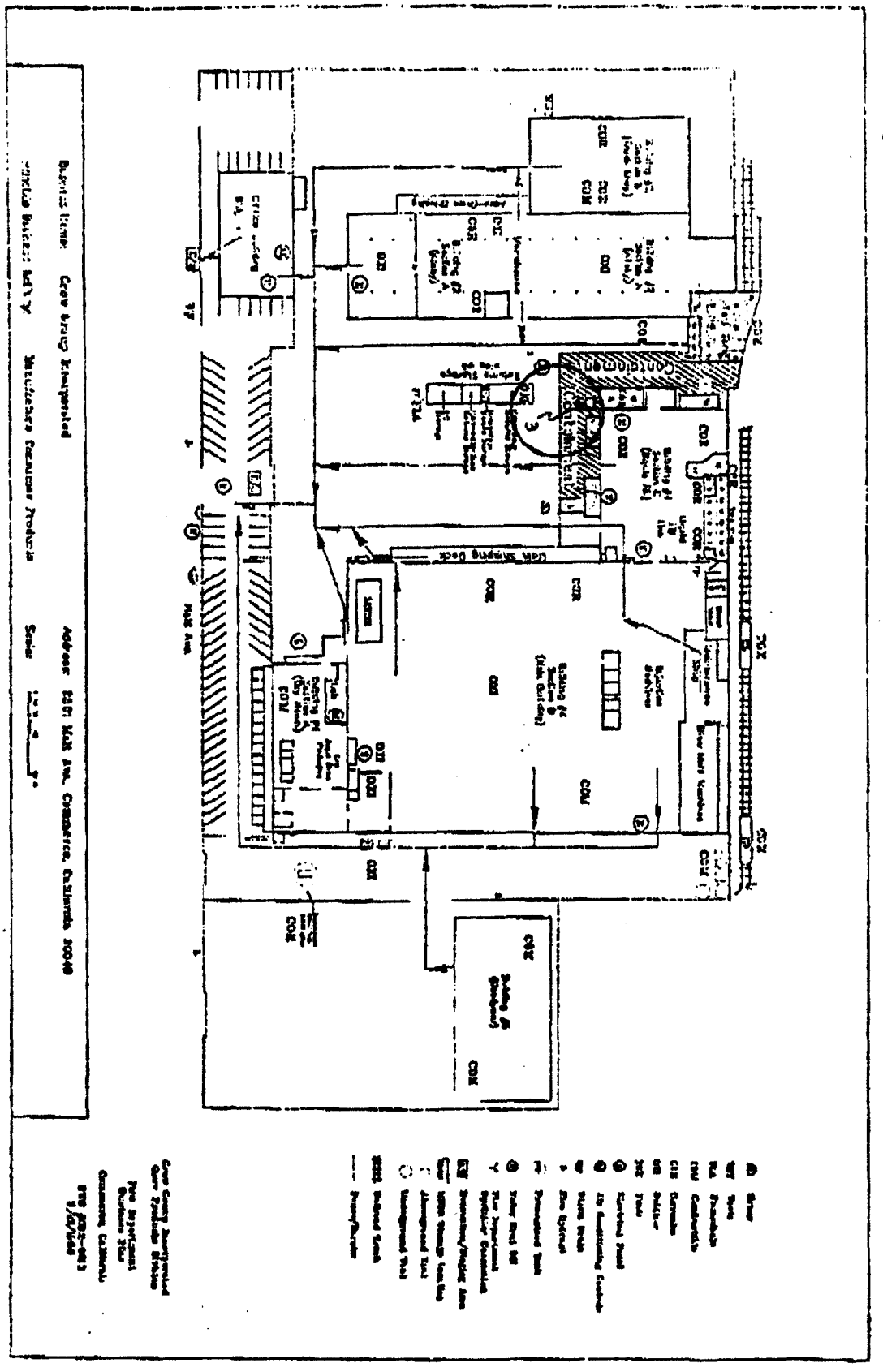
Containment Area

Although any location sustaining a spill within the containment area is typically cleaned and decontaminated immediately upon discovery, decontamination procedures for the containment systems have been included. Cleaning the containment area starts with washing the outside of the tank and then gradually moving out to the final collection area. A high pressure washer is utilized to thoroughly wash the outside surfaces of the tank and the containment area to remove any trace residues that may be present.

Since the tank has already been decontaminated, potentially contaminated wash water will not be reintroduced to the tank. Water is accumulated in the containment collection system, and tested to determine acceptability at the POTW.

After all areas of the containment system have been washed, randomly selected areas will be wipe tested to ensure that the containment area has been properly decontaminated. If any residual contamination is found in the area, the entire procedure will be repeated until it is determined that the area is properly decontaminated.

All Federal, State and local requirements regarding site and personnel safety will be followed during the decontamination procedure.



: S MALT AVENUE
COMMERCE, CA

The Grow Group, Inc. (GGI) handles, stores and processes hazardous materials at their Commerce facility. One such group of materials is called ACL chlorinating compounds. ACL 90 is a trade name for a Monsanto Industrial Chemical Company's product. ACL 90 is actually a chemical called Trichloro-S-Triazinetrione or Trichlorosocyanuric Acid. The NFPA classifies ACL 90 as a Class 2 oxidizer. The strong oxidizing properties of this compound requires that certain procedures be followed to promote safety during their manufacturing, handling, and storage.

ACL 90 is highly reactive to water and heat. ACL 90 undergoes decomposition with small amounts of water to liberate large quantities of Nitrogen Trichloride, which is an explosive chemical, along with other toxic gases. All ACL chlorinated products will decompose when heated to a temperature above 220°C (428°F). The compound will continue to burn until the heat source is totally removed. The toxic gases that are evolved when exposed to water or heat include: Chlorine, Phosgene, Nitrogen Trichloride and Cyanogen Chloride.

ACL chlorinating composition is a strong irritant to the mucous membranes producing tearing, sneezing and coughing. Unless exposure is very severe, the effects are temporary, and there is no permanent damage to the tissues. To a somewhat lesser degree, these compounds are also irritating to the skin, causing itching and redness, especially in contact with perspiration (moisture).

GGI manufactures swimming pool disinfecting tablets by compressing ACL 90 into tablets. This process produces ACL 90 dust and larger waste solids. These particulates collect on the floor, creating a hazardous waste. Monsanto recognizes this to be a dangerous practice. Monsanto recommends that any spillage of ACL should be cleaned up as soon as possible to prevent contamination with foreign material with which it may react and must remain dry. Monsanto further recommends immediate packaging and transportation to an approved disposal facility.

As currently defined in 40 CFR 261.23, ACL chlorinating compositions, when discarded, are hazardous wastes exhibiting the characteristics of reactivity (D-003). CCR Title 26 section 22-66705(a)(4) defines a reactive waste as hazardous if it generates toxic gases, vapors or fumes, when mixed with water, in a quantity sufficient to present a danger to human health or the environment.

Source: STORAGE AND HANDLING OF ACL CHLORINATING COMPOSITIONS. Bulletin Number IC/WT-104, Monsanto Industrial Chemicals Company.

OCTOBER 11, 1988

TO: GROW GROUP FILE

FROM: PETER M. TORRES, HAZARDOUS MATERIALS SPECIALIST

SUBJ: INTERVIEW WITH FRANCISCO (PANCHO) SANTIAGO
CDL # N263838
25833 SWEETLEAF
MORENO VALLEY, CA 92388

DATE OF INTERVIEW: SEPTEMBER 6, 1988

LOCATION: GROW GROUP, INC.
2501 MALT AVE.
COMMERCE, CALIF

Pancho was introduced to me by Mr. Greene as the Grow Group employee who has been handling the neutralization process. Pancho began by showing me where the neutralization tank was located. He explained that the large aboveground poly tank was used exclusively for the purpose of neutralizing waste trichlor and soda ash. I asked what material he was referring to. He replied the material stored in the fiberboard drums stored in the warehouse. I asked if he meant the drums where the recent problem took place. He said yes. He explained that the material in those drums was a mostly a mixture of trichlor and soda ash. This mixture was generated from the tableting process when at the end of production the trichlor popes were blown out with soda ash. This blowdown waste, along with collected spillover and floor sweepings was gathered and placed in the fiberboard drums and they where then stored in the warehouse.

He explained that over the last year he has been neutralizing the accumulated material stored in the drums. He said that he would fill the poly tank with about 4500 gallons of water. Then he would add through an opening at the top of the tank about 400 pounds of trichlor material. I asked him how he knew that he had dumped 400 pounds of trichlor if the material in the drums was a mixture of trichlor and soda ash. He replied that he estimated the volume of trichlor by vision. After he dumped the material into the tank he would have to let the material sit for 24 hours to allow neutralization to occur. He explained that in the past he had to wait 48 hours for the process to be complete. That was because he was using cold water to fill the tank. He could now use hot water because the company recently installed a heat exchanger to heat the water for the tank. He further stated that if the company would install a mixer that the neutraliztion time could be cut down to 12 hours.

After waiting the appropriate amount of time he would then take a sample of the solution to the lab where it would be tested for pH and chlorine content. If it was within allowable limits he would then discharge it to the sewer. I asked how long he had been doing this. He replied that over the last year he has been neutralizing the drummed waste on a regular basis although no every 24 or 48 hours because of his other duties required his attention. I asked him if this was the only use of the tank. He replied that it was strictly for waste disposal. I asked who his supervisors were and he gave me the following:

Ken and Mark
Max Smith-----©
Pancho-----©

I concluded the interview and left the facility.

Mr. Carl Sjoberg
Los Angeles County
Department of Public Works
Waste Management Division
2250 Alcazar Street
Los Angeles, CA 90033

Dear Mr. Sjoberg:

RE: Sump Closures at Grow Group, Inc., Commerce, California Facility

We submit this closure plan for the closure of sumps at our facility located at 2501 Malt Avenue, Commerce, California. Figure 1 shows the location of this facility. The plan covers five sumps:

- Caustic collection sump
- Acid collection sump
- Water treatment tank
- Acid spill-containment sump
- Truck wash sump

None of these sumps ever contained flammable or combustible liquids. Grow Group wishes to close each of these sumps in place.

Caustic Collection Sump

The caustic collection sump consists of three rectangular concrete chambers, as shown in Figure 2. The sump, approximately 7.5 feet by 5 feet and 4 feet deep, lies along the northeast side of building 4, the consumer packaging line. A 2-foot square manhole covers each cell. Tank trucks delivering caustic and bleach to the facility discharge at this point into pipe connections for transfer to the caustic and bleach storage tanks. A 6-inch concrete berm contains any spillage which may occur during caustic transfer. A floor drain allows the caustic to flow into the sump. The sump is periodically pumped out to the plant treatment system. There is no indication that the caustic sump has ever leaked.

Specially-installed caustic-resistant concrete covers the bermed area above the caustic sump. This special concrete

would have to be replaced if the sumps were removed from the ground.

Acid Collection Sump

The acid collection sump consists of a 3-foot diameter circular concrete chamber approximately 6.7 feet deep, as shown in Figure 2. A 2-foot diameter manhole covers the sump. Tank trucks delivering acid discharge at this point through pipe connections to the acid storage tanks. A 6-inch concrete berm contains any spillage and channels it to a floor drain which allows the acid to flow into the sump. In addition, a floor drain from the acid-handling area inside the building empties into the sump. The sump is periodically pumped out to the plant treatment system. The integrity of the sump is unknown.

As in the case of the caustic sump, the special acid-resistant concrete covering the site would have to be replaced if the sump were removed.

Water Treatment Tank

Figure 2 also shows the former water treatment tank. The tank, which is approximately 7.6 feet by 5 feet and 12 feet deep, consists of three interconnected rectangular concrete cells. A 2-foot square manhole covers each cell. The floor drains from the caustic area of the consumer products packaging line empty into the first cell. The contents of the first cell are periodically pumped out to the plant treatment system. Effluent from the plant treatment system connects to a tee at the outlet of the third cell and discharges to the sewer.

Grow Group plans to discontinue placing any free liquids in the cells of the water treatment tank. The piping which connects the building floor drains to the tank will now be connected, through a pump, directly to the plant treatment system. The effluent discharge line will continue to pass through the tank. Closure of the tank in place will allow continued access to this system piping for maintenance and repair. Removing the water treatment tank would destroy this piping. In addition, the city water line which supplies water to the building lies adjacent to the tank area. Removing the tank may damage the city water line.

Acid Spill-Containment Sump

The acid spill-containment sump lies south of the consumer products packaging building outside a sulfuric acid storage area. Figure 3 shows the location of this sump. The sump originally collected any occasional spill runoff from the area around the sulfuric acid tank, but that storage tank has been idle for years. The sump now only collects rain water. The sump lies under the pavement and consists of a concrete cell approximately 6 feet square by 6 feet deep. A 2-foot

square manhole covers the sump. There exists no indication that the sump ever leaked. Removal of the sump would destroy the surface pavement.

Truck Wash Sump

The truck wash sump lies under the pavement in the truck maintenance area. Figure 4 shows the location of this sump. The sump collects oily water from truck washing and any drippings from truck maintenance. The sump consists of two rectangular concrete cells approximately 10 feet apart and connected by pipe. One cell is approximately 2 feet square and 1.6 feet deep and covered by a 2-foot square cap. The other cell is 8 feet by 9 feet and 6 feet deep and covered by a 2-foot diameter manhole.

The larger cell is to be closed. The line connecting the smaller cell to the larger one will be disconnected at the smaller cell. There exists no evidence that this sump ever leaked. Removal of the sump would destroy the overlying pavement and disrupt the truck maintenance operations.

Test Borings

Test borings will be made and soil samples analyzed in order to demonstrate site integrity under each of the sumps. After each sump has been cleaned, as discussed in the sump closure section, the floor of the sump will be penetrated and a sample taken with a modified California sampler at a depth of 2 to 4 feet below the bottom of the sump. The sumps that are divided into cells will have a sample taken from under each cell.

One background soil sample will be taken from the landscaped area near the front of the administration building. We will also contact the Los Angeles Regional Water Quality Control Board to identify any ground-water investigations which have been conducted in the vicinity of the Grow Group plant. From those investigations, we will determine the approximate ground-water elevation under the Grow Group plant.

Analysis

Brass or aluminum liners will be used in the modified California sampler to contain the soil sample. Each liner will be capped with aluminum immediately after removal from the sampler, labelled, and placed in a refrigerated ice chest. The samples will travel under chain-of-custody procedures to a California-certified laboratory.

The samples taken from under the caustic collection and acid collection sumps, along with the samples from under the water treatment tank, will be analyzed by ion chromatography for sulfates, chlorides, chlorites, and hydroxides. The samples will also be analyzed for pH. The sample from the sulfuric acid spill-containment sump will be analyzed for sulfates and pH.

The samples from truck wash area sump will be analyzed for aromatic volatile organics (EPA method 8020), and total petroleum hydrocarbons.

Results of the site integrity investigation will be reported to the Department of Public Works prior to final filling and closure of the sumps.

Sump Closure

Each sump will be pumped dry of any standing liquids. Any sludge that may be in the bottoms of the sumps will be removed. The sumps will then be triple-rinsed with a high-pressure spray and pumped out. The first rinse of the acid-collection sump will be using dilute caustic solution, followed by two rinses of clean water. The caustic sump and the water treatment tank will be rinsed first with dilute acid solution followed by two rinses of clean water. The remaining cells of the water treatment tank and the unused acid spill-containment sump will be triple rinsed with clean water. The truck wash area sump will be triple-rinsed using clean water and detergent.

Closure will commence after the analytical results of site integrity have been reported to the Department of Public Works. A sand and water mixture will be pumped into each sump, with the exception of the water treatment tank. The manholes over the sand-filled sumps will then be paved. The water treatment tank will not be filled in order to allow maintenance access to the pipes which pass through it. The water treatment tank, through the piping changes previously discussed, will no longer receive free liquids.

Report

A final report documenting the site integrity investigation results and sump closure procedures will be prepared and submitted to the Department of Public Works.

Health and Safety

All work will be performed under a supervisor who understands the hazardous potential of materials to be handled at this site. In addition, all field personnel will have undergone a 40-hour training class and passed a written examination which exceeds the requirements of the Superfund Amendment and Reauthorization Act of 1986, Section 126, "Worker Protection Standards".

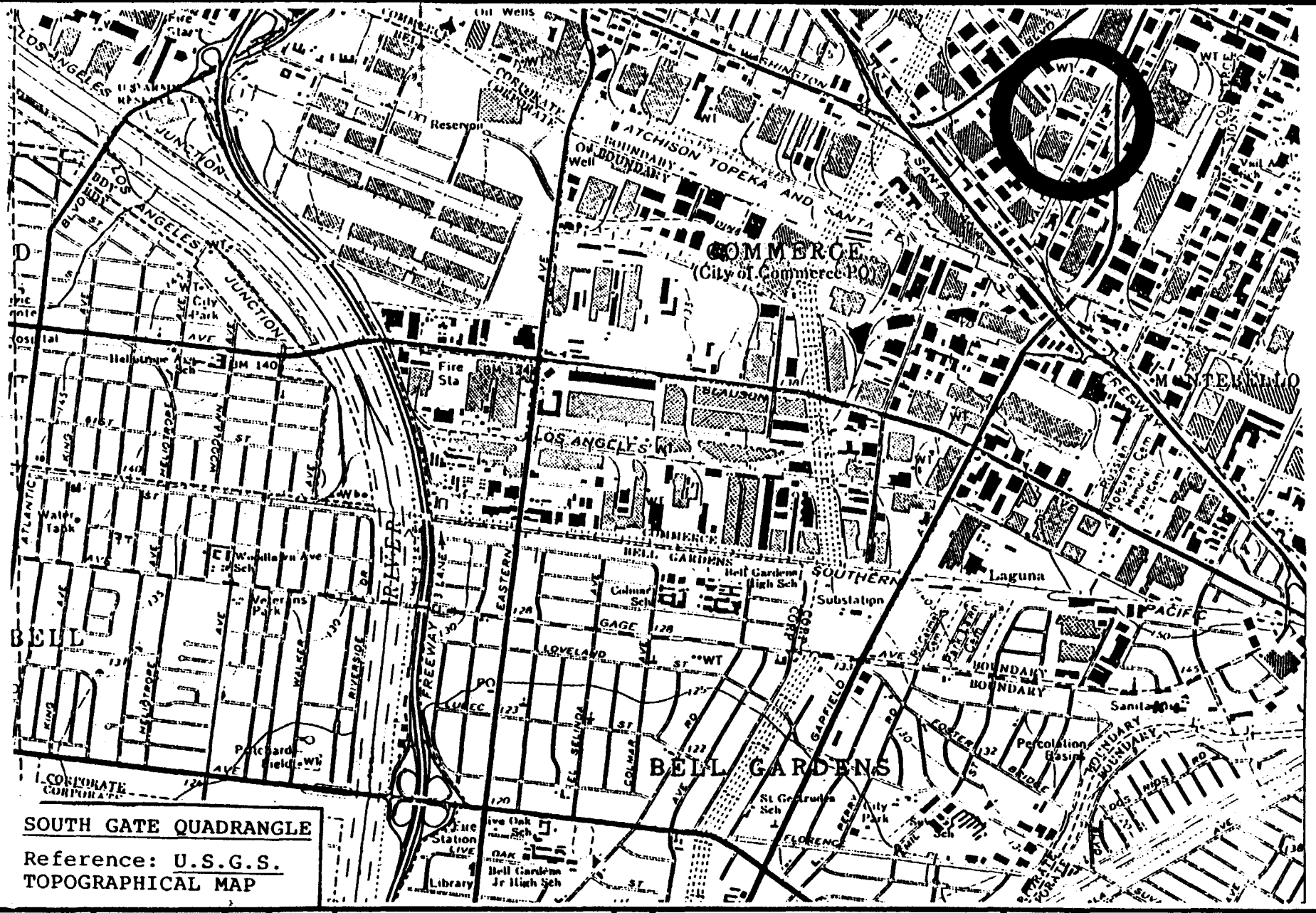
In addition, all work will be carried out in a manner that will not endanger Grow Group employees, the general public or the environment.

If you have any questions or comments regarding the sump closure plan, please contact me at (213) 724-6530.

Sincerely,

Kim Marti
Plant Manager

KM:sg



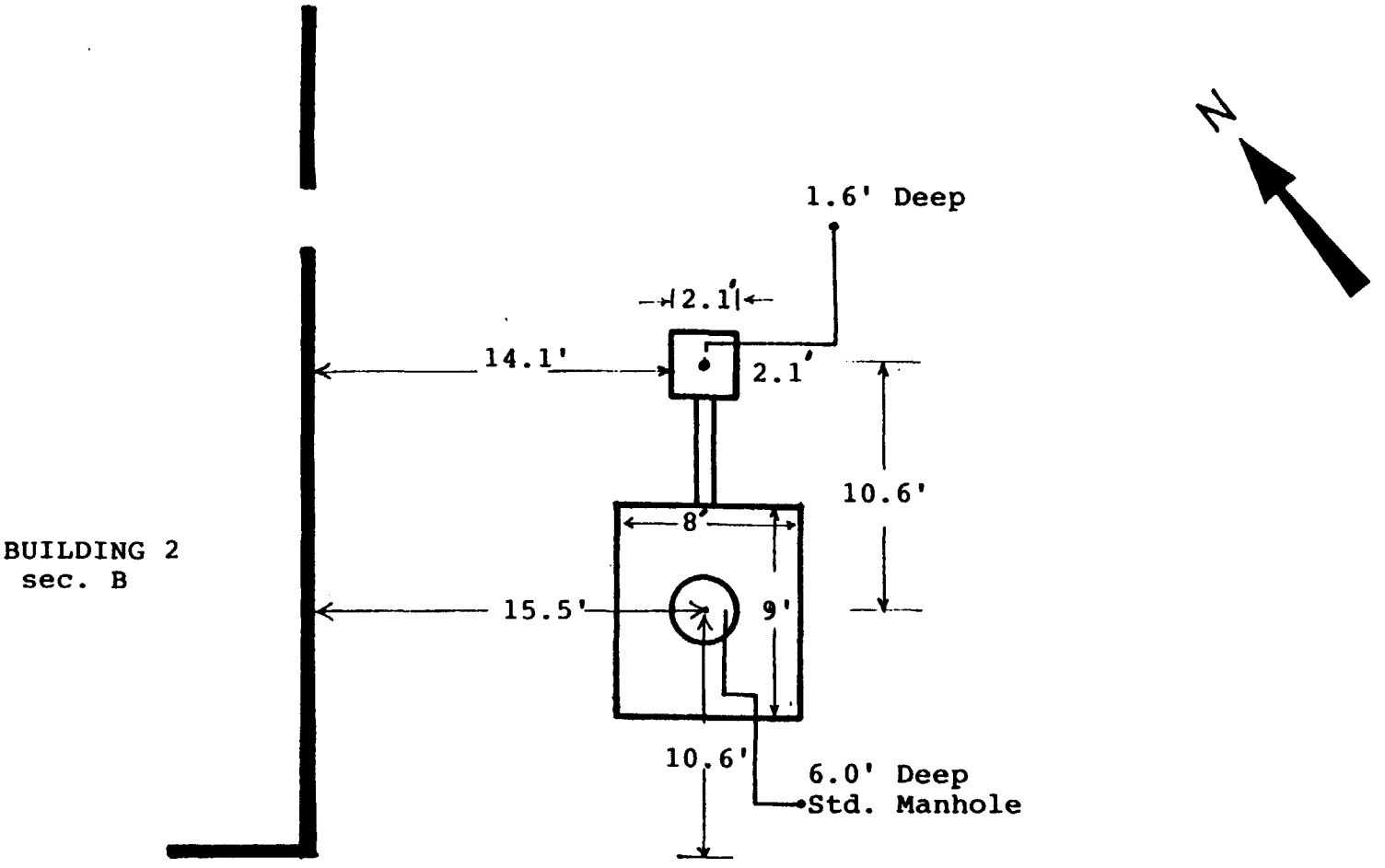
SCALE	DRAWN BY	NO.	DATE	REVISION	BY
None	D.B.				
DATE 12/11/87	CHECKED R.T.				
SHEET__OF__	APPROVED				

FIGURE 1

GROW GROUP FACILITY
COMMERCE, CALIFORNIA

OHM
THE ENVIRONMENTAL SERVICES COMPANY
BOX 551 FINDLAY, OHIO
419/423-3526 800/537-9540

PROJECT	DRAWING	REVISION



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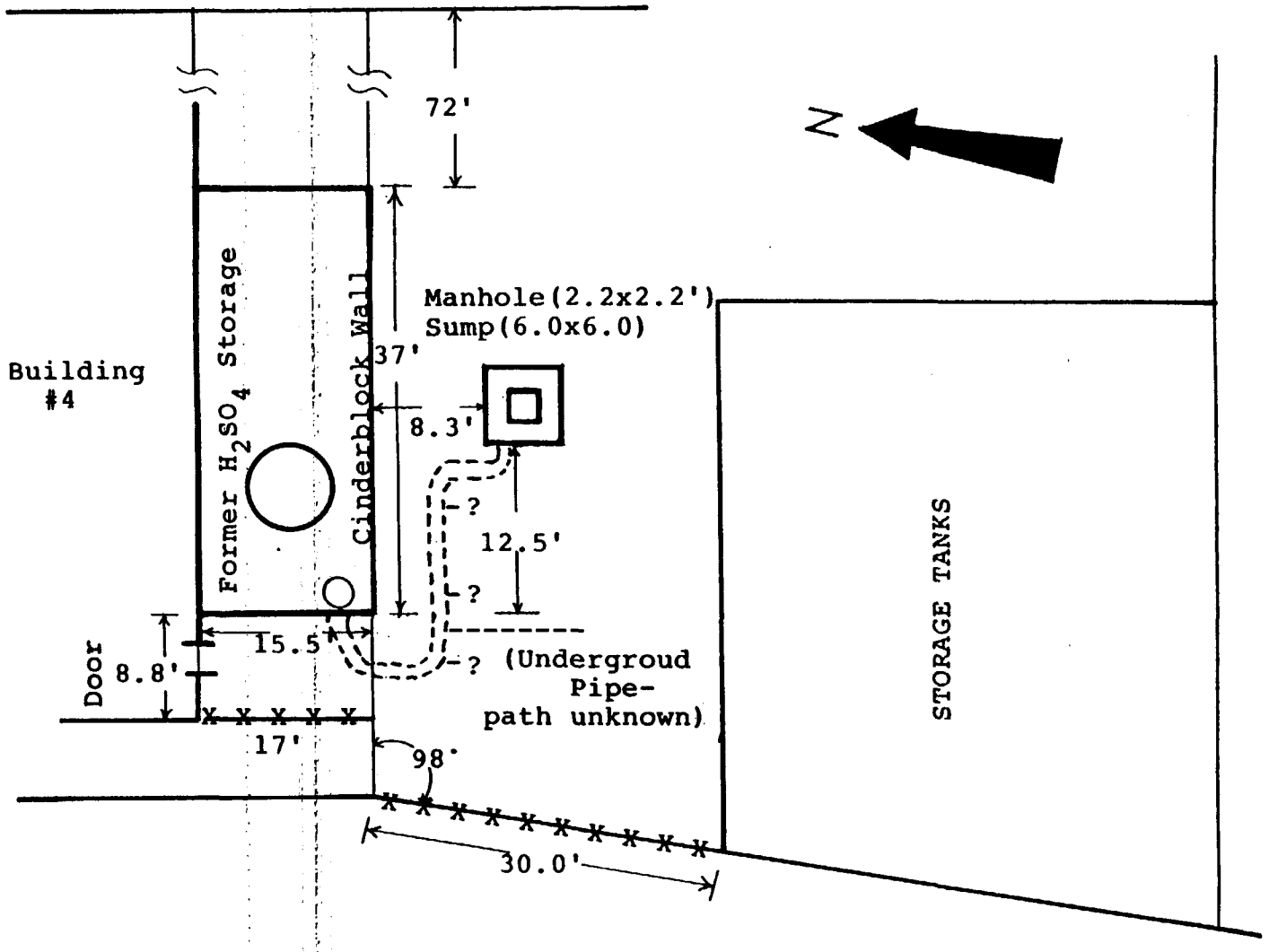
DATE 3/29/88	CHECKED RT				
SHEET__OF__	APPROVED				

FIGURE 4
TRUCK WASH SUMP
GROW GROUP FACILITY

OHM
THE ENVIRONMENTAL SERVICES COMPANY
BOX 551 FINDLAY, OHIO
419/423-3526 800/537-9540

PROJECT	DRAWING	REVISION

N69101



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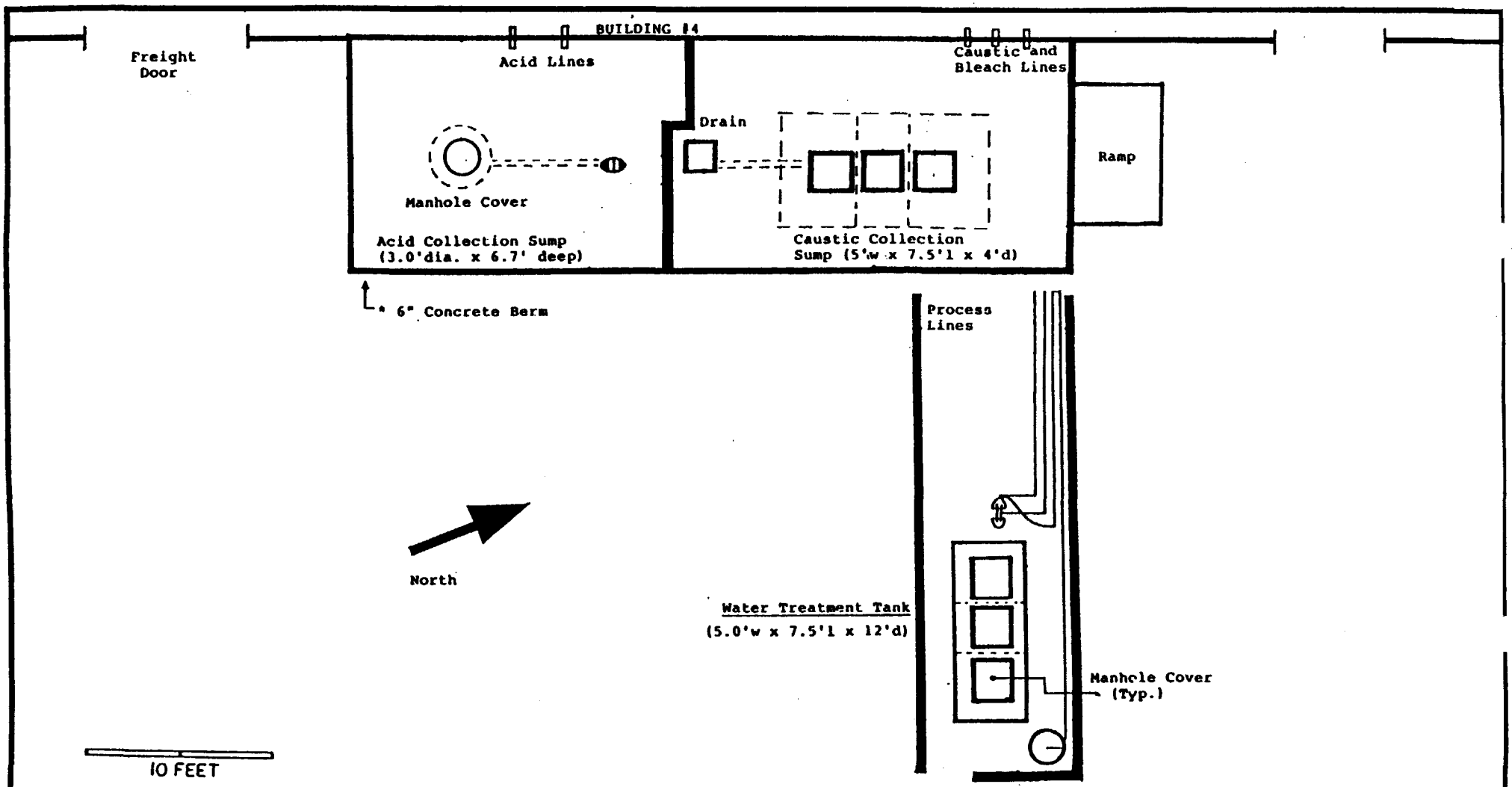
none	DB				
DATE 3/29/88	CHECKED RT				
SHEET__OF__	APPROVED				

FIGURE 3
ACID CONTAINMENT SUMP
GROW GROUP FACILITY

OHM
THE ENVIRONMENTAL SERVICES COMPANY
BOX 551 FINDLAY, OHIO
419/423-3526 800/537-8540

PROJECT	DRAWING	REVISION



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	D.B.				
DATE 12/11/87	CHECKED R.T.				
SHEET__OF__	APPROVED				

FIGURE 2
GROW GROUP FACILITY
Commerce, California

OHM
THE ENVIRONMENTAL SERVICES COMPANY
BOX 551 FINDLAY, OHIO
419/423-3526 800/537-9540

PROJECT	DRAWING	REVISION

(1 of 10)

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380

NOV 15 1988

Mr. Kim Marti, Plant Manager
Grow Group, Inc.
2425-2501 Malt Avenue
Commerce, CA 90040

Dear Mr. Marti:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE - CAD085393080

On September 12, 1988, the Department of Health Services (DHS) conducted a followup inspection of Grow Group, Incorporated (GGI), a hazardous waste treatment and storage facility located at 2501 Malt Avenue, Commerce, in Los Angeles County, California.

As a result of that inspection, additional and continuing violations of the generator requirements and interim status requirements provisions of the California Health and Safety Code and Title 22, Chapter 30, California Code of Regulations (22 Cal. Code Regs.) were identified.

The specified violations and required corrective actions are listed below. Locations of hazardous waste management units are referenced to buildings on the property as identified by numbers on drawing #COM-8813, dated 9/21/88, submitted with GGI's September 29, 1988 letter of information to John Hinton of DHS.

Failure to correct the identified violations within the schedule provided below in Section II will result in DHS taking further appropriate legal enforcement action.

I. SCHEDULE OF VIOLATIONS:

COUNT 1: 22 Cal. Code Regs., Section 67120 (a). Design and Operation of Facility.

This facility was not maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, in that:

On August 10, 1988, and again on September 2 and 3, 1988, public safety agencies found it necessary to respond to the facility as a result of releases of toxic fumes from hazardous wastes into the nearby neighborhoods. On September 2 and 3, 1988, evacuations of several thousand residents were necessary. The Los Angeles County Department of Health Services (LACDHS) reported to DHS that the source of these fumes was an accumulation of up to 500 drums of trichloroisocyanuric acid and sodium dichloro-isocyanurate (both of which are reactive and flammable wastes) stored in a three-sided shed (Building # 5). Some of the containers were reported to have

NOV 15 1988

accumulation dates indicating storage for over two years, and that the containers were in deteriorated condition.

At the time of this inspection, the Building # 5 storage area where the above hazardous wastes had been stored still contained a layer, up to one half inch or so thick, of glassy or sticky looking solid or nearly solid material which facility representatives acknowledged was a residue of the same hazardous wastes.

The containment areas around the product storage/process tanks next to the back wall of Building # 4 were not impervious. Stains and mineral deposits along the outside of the back of Building # 4 traced the course of past discharges of wastes.

The containment around two tall unlabeled sodium hydroxide tanks south of Building # 4 contained pooled liquid, apparently from the caustic storage tanks; mineral deposits clung to the outside of the containment wall, indicating past seepage of liquid wastes through cracks in that wall.

Open (uncovered) plastic drums of up to 55 gallon capacity, containing white solid waste labeled as Top Chlor, a reactive material, were stored just north of Building # 2. In the event of rainfall, the wastes could have been contacted by, and reacted with, rainwater falling on them.

COUNT 2: 22 Cal. Code Regs., Section 67257 (c) and (d). General Operating Requirements for Interim Status Facilities.

Where hazardous waste was continuously fed into a tank, the tank was not equipped with a means to stop this inflow (e.g., a waste feed cutoff system or bypass system to a standby tank).

Residues around the hazardous waste storage tank associated with the wastewater treatment plant, at the eastern corner of Building # 4 indicated it had overflowed in the past.

COUNT 3: 22 Cal. Code Regs., Section 67145.

(i) After experiencing an emergency requiring implementation of the facility contingency plan, the owner/operator did not bring the facility into compliance and so notify the Department and appropriate state and local authorities before resuming operations.

(j) Facility did not submit to the Department within 15 days the required written report of the emergency incidents.

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DHS has not yet received these reports, and this is a continuing violation until GGI submits such a report for each occasion that necessitated implementation of contingency plans.

COUNT 4: 22 Cal. Code Regs., Section 66388 (b)(1). The owner/operator of the facility built and operated hazardous waste processes that are not described in the November 17, 1980 Part A permit application without notifying the Department prior to construction/operation, in that:

The wastewater treatment tanks to the east of Building #4 are not mentioned in the Part A, and the facility did not submit to the Department any notification describing the changes prior to installation. GGI's description (in its variance request) of the process used in these tanks indicates that the wastes treated are RCRA regulated (reactive); treatment involves oxidation reduction reactions and/or heating of the reacting wastes (not only elementary neutralization); and toxic gas may be produced in the event of process upset.

The drum storage area next to Building # 2 is designated by the Part A plot plan as "pallet storage", not as a hazardous waste storage area. Containers of hazardous wastes stored there showed labels from Georgia-Pacific Corporation (GPC). Facility representatives stated that nothing had been received from GPC since the ownership change in 1986. This indicates the materials had been stored at least two years. Facility representatives acknowledged these materials were waste at the time of the inspection. The Department has yet to receive the required notification of the changed use of this area.

During the September 12, 1988 inspection, GGI representatives stated that one of the tanks in the tank farm next to Building # 2 was being used to store waste bleach (a hazardous waste) before it was processed through the wastewater treatment plant. This use of the units in the tank farm is not described in the Part A, and the Department has yet to receive the required notification.

The drum storage area adjacent to the southwest side of Building # 5, where used hydraulic oil was stored, is not described in the Part A, and the Department has not received the required notice relative to this new hazardous waste management unit.

Drawing #COM-8813 disclosed a waste tank (described by another drawing dated 7/27/88 as an oil water separator) located outside Building # 2. This also is not described in the Part A, and the Department has yet to be notified of its existence and size, and what wastes are stored/treated in it.

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Drawing #COM-8813 also shows "Returns Storage" in a small warehouse structure (Building # 3), with additional notations of "Hazardous Returns Storage" and Hazardous Waste Storage". The Department has not received the required notification relative to this unit.

COUNT 5: 22 Cal. Code Regs., Section 66471. Hazardous Waste Determination Requirement for the Generator.

GGI failed to determine if each waste stored in the yard just north of Building # 2 is listed as a hazardous waste in Article 9 or has a characteristic of hazardous waste as defined by Article 11 of 22 Cal. Code Regs., in that:

When questioned by DHS inspectors, Company representatives stated they did not know what additives GGI uses in the cooling tower on the north side of Building # 4, which was discharging liquid to the yard surface.

They also did not know what wastes the oil water separator tank adjacent to the north side of Building # 4 treated, or what kind of oil was in the open drum marked "(Hazardous) Waste Only" next to these units.

COUNT 6: 22 Cal. Code Regs., Section 67243 (a). Management of Containers.

Containers holding hazardous wastes were not kept closed during storage, except when it was necessary to add or remove waste, in that:

An open drum labeled "Waste Only," partly full of oil (a California regulated hazardous waste) stood next to a rack of supply oils north of Building # 5. There were no employees within sight of it, and no cover for a drum anywhere near it.

COUNT 7: 22 Cal. Code Regs., Section 67246. Special Requirements for Ignitable or Reactive Waste.

The reactive wastes (trichloroisocyanuric acid and sodium dichloroisocyanurate) that had been stored in Building # 5 had been stored less than 50 feet from the property line.

COUNT 8: 22 Cal. Code Regs., Section 67247 (c). Special Requirements for Incompatible Wastes.

Some of the drums containing wastes that were stored just north of Building # 2 were labeled as containing sulfuric acid (33 percent or 93 percent), Top Chlor, sodium thiosulfate 60 percent, formaldehyde 37 percent, or other (unlabeled) materials/wastes. These incompatible wastes were not separated or protected from one

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another by any dike, berm, wall, or other device.

II. SCHEDULE FOR CORRECTION:

Based on GGI's representations that it wishes to seek a reclassification to the status of hazardous waste generator only, GGI may choose one of the following two compliance alternatives:

(A) continue to operate this facility as a hazardous waste treatment and storage facility (TSF), or
(B) close the facility as a TSF and operate it in the future as a hazardous waste generator only.

Should GGI choose alternative (A), it must submit a written report by December 15, 1988, which describes in detail the actions GGI has taken, or will take to accomplish, at least, all of following, including a time schedule for implementation:

1. Minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents (dust, liquid, or toxic gas) to air, soil, or surface water, which could threaten human health or the environment. These actions shall include but not be limited to:

   Prepare and implement a schedule of inspection for each hazardous waste management unit, including conditions to be looked for, and schedules for corrections of any hazards, deterioration or leaks from units or components. Provision must also be made for ensuring documentation of any necessary corrective measures.

Reference: 22 Cal. Code Regs., Chapter 30, Section 67120 and Articles 24 and 25.

2. Obtain and install high level sensors and visible or audible alarms on the oil water separator tanks, the wastewater treatment/storage tanks east of Building # 4, and the hazardous waste storage tank reported to be in use in the tank farm. These sensors/alarms shall be set and operated to ensure that there is sufficient freeboard in each tank at all times to prevent their overflowing. Each tank shall also be equipped with a waste feed cutoff system, if hazardous waste is continuously fed into the tank. You are also directed to establish a daily inspection schedule that includes noting the level of waste in each hazardous waste storage/ treatment tank.

Reference: 22 Cal. Code Regs., Sections 67257 (c) and (d), and 67104

3. Prepare and submit to this office, a separate written report containing details of each occurrence since January 1, 1986, for

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which assistance by a public safety agency was required to deal with the release of hazardous waste or hazardous waste constituents into the air, soil or surface water, or for which the facility contingency plan had to be implemented. The reports shall each include, but not be limited to:

(a) Name, address, and telephone number of the owner or operator.
(b) Name, address, and telephone number of the facility.
(c) Date, time, and type of incident (e.g., fire, uncontrolled release of toxic gas, etc.).
(d) Name(s) and quantity(ies) of material(s) involved.
(e) The extent of injuries to employees and/or others, if any.
(f) An assessment of actual or potential hazards to human health or the environment, if this is applicable.

A description of the actions taken by the owner/operator of the facility to contain and/or recover any release of hazardous waste, and to mitigate its effects on human health and the environment.
Estimated quantity and disposition of recovered material that resulted from the incident.
A copy of the revised contingency plan, if the plan was revised because it failed during the incident.

Reference: 22 Cal. Code Regs., Section 67145 (i) and (j).

4. Prepare and submit to this office a revised Part A permit application containing at least the following: (A copy of the required forms and instructions are attached).

1) The latitude and longitude of the facility.

2) The legal name, address, and telephone number of (each) owner or operator of the facility, past and present, and their agents for service, if applicable.

3) A description of the nature of the business.

4) An indication of whether the facility is new or existing, and whether it is a first or revised application. Include sufficient documentation to show that all proposed treatment, storage, or disposal activities were operating by November 19, 1980. (The Part A application submitted by Georgia-Pacific Corporation alone does not provide sufficient information to meet this requirement.

5) A description of each of the processes and/or units to be used for treating storing or disposing of hazardous waste, the design capacity of each of these items, and the length of time hazardous waste is retained in the unit before it is removed.

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6) The specific identity of each hazardous waste to be treated, stored, or disposed at the facility; an estimate of the quantity of each waste to be treated, stored, or disposed annually; and a general description of the process used, or to be used, for each such waste.

7) A copy of any waste discharge permit or permit to construct and operate which other local or state agencies have issued to this facility.

8) A topographic map extending one mile beyond the property boundaries or site depicting the facility; each of its hazardous waste treatment, storage or disposal facilities; if applicable, each well where fluids from the facility are injected underground; each building and its use; and springs, other water bodies and all wells (in use or abandoned), including those used for drinking water, irrigation, and oil and gas extraction listed in public records or otherwise known to the applicant within one fourth mile of the facility property boundary.

9) A scale drawing of the facility showing the location of all past, present, and future hazardous waste treatment, storage, and disposal areas. Include detail drawings and descriptions of each hazardous waste management unit as necessary to fully describe tanks and/or containment structures, including materials of construction and liners, monitoring equipment, and control and alarm systems.

10) Photographs of the facility clearly delineating all existing structures; existing hazardous waste treatment, storage, and disposal areas; and sites of future treatment, storage, and disposal areas.

11) A zoning map of the area showing the zoning and land uses for property within 2000 feet of the facility.

The application shall include complete information relevant to at least the following units or areas:

1) Building # 5, where reactive wastes were recently stored.

2) The oil water separator unit north of Building # 4.

3) The wastewater treatment plant, including all tanks used to store or treat the waste, now or in the past.

4) The drum storage area adjacent to Building # 5 where used hydraulic oil was stored.

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5) The container storage area north of Building # 2, where both full and empty containers were stored.

6) The waste tank adjacent to the south corner of Building # 2.

7) The underground tanks (clarifiers) shown as neutralization units on the November 17, 1980 Part A within and/or east of Building # 4.

8) The underground storage tanks at the west corner of Building # 4, shown by the November 17, 1980 Part A.

9) Building # 3, where hazardous returns and hazardous wastes are stored.

5. Characterize each type (group of containers containing apparently identical material) of containerized waste stored at this facility, and submit to this office by November 15, 1988 a written report of the actions taken or to be taken to characterize each type of waste prior to disposal. These actions must include at least:

1) The parameters for which each hazardous waste will be analyzed and the reasons for selecting those parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to enable the facility to manage the waste safely and in accordance with the regulations).

2) The test methods that will be used to test for these parameters.

3) The manner of the sampling and sample management of wastes and other materials, including sampling, planning methodology, equipment, sample processing, documentation, and custody procedures. These methods shall either be as described in "Test Methods for the Evaluation of Solid Waste, Physical/ Chemical Methods", SW-846, 2nd Edition, U.S. Environmental Protection Agency, 1982; or an equivalent method.

4) If the subject wastes have been disposed of, include in your report complete information concerning the disposition of each type of waste - the type and amount, the process of characterization, the date of disposition, the complete name and address of the person(s) or firm(s) that handled the waste, and the transporter and disposal facility, and a copy of the completed manifest, if applicable.

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Reference: 22 Cal. Code Regs., Section 67102.

6. Immediately establish a weekly (or oftener) inspection schedule for the container storage areas. Conditions to be looked for and addressed include but are not limited to:

   a) Containers not displaying "Hazardous Waste" labels
   b) Leaking or open containers (Containers of liquid must be sealed)
   c) Containers whose contents are not clearly identified
   d) Containers that do not show an accumulation starting date, and
   e) Adequate aisle space to ensure ready access to all containers in the event of an emergency.

Include in your compliance report a copy of a completed inspection log sheet for each of the above inspection schedules, and the written instructions for conducting such inspections, if separate from the log sheets.

Reference: 22 Cal. Code Regs., Sections 67104 and 67243 (a).

7. Provide this office with a written report detailing the actions taken, or to be taken, to remove the residues of hazardous waste from the floor of Building # 5, and to ensure that the removal does not cause a hazard to human health or the environment. Include details of sampling and analysis of the floor or wipe samples and/or underlying soil which will confirm complete removal of all significant deposits of hazardous waste.

Reference: 22 Cal. Code Regs., Sections 67246 and California Health and Safety Code, Section 25189 (d).

8. Ensure that containers of wastes that are incompatible with other wastes stored nearby are separated from the other materials, or protected from them by means of a dike, berm, wall, or other device. Include a copy of the design drawings for any construction necessary to comply with this requirement, if applicable.

Reference: 22 Cal. Code Regs., Section 67247 and 67102.

If GGI chooses Option (B), to operate this facility as a hazardous waste generator only, it must bring the facility into full compliance with all of the generator requirements as specified in 22 Cal. Code Regs., Article 6, including, but not limited to, the referenced provisions in:

Article 11 (hazardous waste determination),
Article 19 (preparedness and prevention),
Article 20 (contingency plan and emergency procedures),
Section 67105 (personnel training), and

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Section 67106 (general requirements for ignitable, reactive or incompatible wastes), and

submit to this office by December 1, 1988, a written report of actions taken or to be taken, to comply with items 3, and 5 through 8, including a time schedule for implementation.

In this case, GGI must cease all treatment of hazardous wastes, and not store any hazardous wastes for more than 90 days, or receive any hazardous wastes from off site, and must immediately initiate closure of all treatment, storage, and disposal units at this facility in accordance with a closure plan approved by this Department, as described in the following paragraph.

In addition to the actions in accordance with either alternative described above, GGI must prepare and submit to this office by December 15, 1988 a closure/post closure plan for the facility's hazardous waste management units which addresses each of the hazardous waste management units, both past and present, at this facility, including but not limited to both underground tanks and aboveground tanks, container storage areas, and any areas of soil known or suspected to be contaminated with hazardous wastes or hazardous waste constituents from this facility, whether they are inside the facility or outside the property boundaries. Such closure/post closure plan(s) must include a detailed description of the actions taken or to be taken to close/remove the unit(s) and to ensure that all contaminated soil, tanks, and/or equipment were/will be decontaminated or removed in accordance with applicable provisions of 22 Cal. Code Regs., Articles 23, 24, and 25.

All reports submitted in response to the above directives shall include a certification containing the language in 22 Cal. Code Regs., Section 66373 (d), signed by a responsible officer of the corporation, as specified in Section 66373.

The Department will conduct an inspection of your facilities to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude DHS from taking additional administrative, civil, or criminal action as a result of the violations noted herein.

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If you have any questions, please contact Roy Thielking at (213) 620 3044.

Sincerely,

David M. Chase, Acting Chief
Surveillance and Enforcement Unit
Region 3 (Los Angeles)
Toxic Substances Control Division

Enclosures

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